

**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 84’S )**  
**METERING REQUIREMENT AND TO ) ORDER NO. 34854**  
**GRANDFATHER EXISTING CUSTOMERS )**  
**WITH TWO METERS )**

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On June 19, 2020, Idaho Power Company (“Idaho Power” or “Company”) applied for authorization to change the two-meter requirement in Schedule 84 to a single-meter requirement for new customer-generators and to grandfather existing customer-generators with two-meter systems under the current rules for 10 years as of December 1, 2020.

On July 17, 2020, the Commission issued a Notice of Application and Notice of Intervention Deadline. Order No. 34728. City of Boise, Idaho Conservation League (“ICL”), Idaho Irrigation Pumpers Association, Inc. (“IIPA”), Micron Technology, Inc., Russell Schiermeier, and the Idaho Sierra Club timely intervened.

On August 10, 2020, the Commission issued an Amended Notice of Application. Order No. 34746.

On September 4, 2020, the Commission issued a Notice of Telephonic Public Hearing and Notice of Modified Procedure. Order No. 34777.

On September 9, 2020, the Commission Secretary issued a Notice of Live-Streamed Public Workshop.

On September 28, 2020, Commission Staff held a live-streamed public workshop.

On October 13, 2020, the Commission held a telephonic public customer hearing.

City of Boise, ICL, Russell Schiermeier, and Idaho Sierra Club joined by Idaho Clean Energy Association (“SC and ICEA”) filed written comments, and 97 written comments were submitted by members of the public. The Commission heard from 13 members of the public at the telephonic hearing.

Now, having reviewed the record, the Commission grandfathers existing customer-generators under Schedule 84 for 25 years and approves the Company’s request to switch to a single-meter requirement for all new customer-generators.

## BACKGROUND

In IPC-E-17-13, the Commission approved the Company's request to create new Schedules for residential customers with on-site generation (Schedule 6) and small general service customers with on-site generation (Schedule 8). Order Nos. 34046, 34147. With the creation of Schedule 6 and Schedule 8, residential and small general service customers with on-site generation were removed from Schedule 84. Schedule 84 continues to define the terms for commercial, industrial, and irrigation ("C, I, & I") customers with on-site generation to net meter. Customers with on-site generation who take service under Schedule 9—Large General Service, Schedule 19—Large Power Service, and Schedule 24—Agricultural Irrigation Service, are included in Schedule 84.

In IPC-E-17-13, the Commission ordered the Company to "initiate a docket to comprehensively study the costs and benefits of on-site generation on Idaho Power's system, as well as proper rates and rate design, transitional rates, and related issues of compensation for net excess energy provided as a resource to the Company." Order No. 34046 at 31. In October 2018, the Company filed IPC-E-18-15 "to study the costs, benefits, and compensation of on-site generation on its system . . . ." IPC-E-18-15 Petition to Initiate Docket at 3. In April 2019, the Company filed IPC-E-19-15 to "initiate a collaborative process to explore modifications to the compensation structure and excess energy value applied under Schedule 84 . . ." and to "temporarily suspend service under Schedule 84 to new Idaho CI&I applicants effective as today's date, April 5, 2019, during the pendency of this case." IPC-E-19-15 Application at 9. The Commission denied the Company's request to temporarily suspend Schedule 84 and established a comment period on how IPC-E-19-15 should be processed in relation to IPC-E-18-15 and IPC-E-18-16.<sup>1</sup> Order No. 34315. After reviewing the comments, the Commission determined that merging Schedule 84 interests into the process already underway in IPC-E-18-15 for Schedule 6 and Schedule 8 customer-generators would disadvantage Schedule 84 customers and could negatively impact the proceedings in IPC-E-18-15. Therefore, the Commission decided to process IPC-E-18-15 and IPC-E-19-15 as stand-alone dockets but stated it expected consistent application of principles across dockets and that findings in IPC-E-18-15 would be presumptively reasonable in IPC-E-19-15. Order No. 34335.

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<sup>1</sup> IPC-E-18-16 was initiated to comply with another Commission directive from IPC-E-17-13 for the Company to file a study exploring fixed-cost recovery in basic charges and other rate design options and culminated in Order No. 34608.

In December 2019, the Commission rejected a proposed Settlement Agreement in IPC-E-18-15 and granted legacy treatment (“grandfathered”) existing Schedule 6 and Schedule 8 customer-generators as of the service date of Order No. 34509. The Commission found that determining whether to grant legacy treatment to C, I, & I net metering customers under Schedule 84 would occur in a separate case based on the facts of that case. Order No. 34546 at 12. In March 2020, the Company withdrew IPC-E-19-15. In June 2020, the Company filed this case.

### **THE APPLICATION**

The Company requests the Commission remove the two-meter requirement for customer-generators taking service under Schedule 84 and replace it with a single-meter requirement as of December 1, 2020, or another date ordered by the Commission. Application at 1. The Company notes that the two-meter system was originally ordered for C, I, & I customers to enable them to offset their energy charges but allow the Company to continue to collect demand charges and a basic load charge (“BLC”) based on gross demand. *Id.* at 2. The Company asks the Commission to grandfather existing Schedule 84 customer-generators for ten years or less when the Commission implements the single-meter requirement. *Id.*

The Company states that as of May 31, 2020, there were 165 active service points with 6.96 megawatts (“MW”) of generation capacity and 175 pending service points with 14.85 MW of generation capacity, for a total of 340 active and pending service points with 21.82 MW of generation capacity under Schedule 84. *Id.* at 4. The Company reports that installed and pending generation capacity in Schedule 24—Agricultural Irrigation Service grew from 2.47 MW at the end of 2019 to 16.40 MW at the end of May 2020. *Id.*

The Company states that switching to a single meter will reduce customer costs and complexities, enable the Company to holistically study the value of excess energy for all on-site generation, and serve as a reasonable distinction to grandfather existing customers. *Id.* at 5. The Company proposes to define an “existing customer” in two ways. First, a customer would be an existing customer if the customer interconnects a two-meter system before the effective date. Second, a customer would be an existing customer if the customer applies to interconnect a two-meter system before the effective date and interconnects the system within one year of applying. *Id.* at 6. The Company also proposes that if a customer applies to the Company for interconnection before the service date of the Company’s Application to the Commission, the customer be required

to prove that a financial investment was made before the effective date of the Commission's order. *Id.*

The Company proposes the following terms for a grandfathered system: 1) a customer who moves into a property with a grandfathered on-site system inherits the grandfathered status; 2) if a system is offline for longer than six months, or moved to another site, the grandfathered status is forfeited; 3) customers who apply before May 1, 2020 may increase their systems' size by no more than 10% or 1 kW, whichever is greater, without losing grandfathered status; 4) grandfathered status ends 10 years from the date of the Commission's order; 5) a customer who modifies a two-meter system to a single-meter system forfeits their grandfathered status. *Id.* at 7. Additionally, the Company recommends that if a Schedule 8 customer-generator who is grandfathered by Order Nos. 34509 and 34546 increases their load to move to Schedule 9, then that customer's grandfathered status would continue as established in Order Nos. 34509 and 34546 in IPC-E-18-15. Finally, the Company proposes that if a customer-generator grandfathered in this case wishes to expand their system on or after the effective date, that customer could choose to: a) keep the grandfathered system behind the second customer-generation meter and place the new system behind the load meter, or b) combine the existing and new systems and follow the customer-generation rules in effect at that time (lose grandfathered status) and place the combined system behind a single meter with the load. *Id.*

## COMMENTS

### a) **Commission Staff.**

Staff supports the Company's request to require new customer-generators to take service through a single meter. Staff Comments at 2. Staff notes that a single-meter configuration allows customer-generators to offset a portion of their demand charge and BLC, whereas two-meter systems do not. *Id.* at 3. Staff states this might not particularly benefit irrigators whose pumps run day and night during irrigation season, but it might benefit Schedule 9 or 19 customer-generators. *Id.* Staff believes that the single-meter configuration better aligns with the intent of net metering; to allow customers to offset their own load and energy requirements. *Id.* at 3 citing Order No. 28951. Although Staff believes ordering a single-meter configuration is appropriate for new customer-generators, Staff sees no benefit, and only added costs, to requiring existing Schedule 84 customers to transition to a single meter. But Staff believes the customer should be able to voluntarily transition to a single meter if they so choose. *Id.* at 3-4.

Staff believes that changing from a two-meter requirement to a single-meter requirement is not a fundamental programmatic change that would justify treating existing and new customer-generators differently. *Id.* at 4. Staff recommends the Commission not decide whether to grandfather existing Schedule 84 customers until a successor program is proposed. *Id.* Staff notes the public testimony in this case shows Schedule 84 customer-generators are making decisions under similar assumptions as Schedule 6 and Schedule 8 generators in IPC-E-18-15. *Id.* at 7. Staff disagrees with Idaho Power's claim that Schedule 84 customers could not reasonably rely on indefinite program stability, and argues those customers could reasonably expect to be treated like residential and small general service customers with on-site generation. *Id.* Staff also notes that Schedule 84 customers have demand charges and a BLC, diminishing concerns about cost-shifts from program participants to non-participants. *Id.* Thus, although Staff believes a determination on grandfathering Schedule 84 customers could be deferred until a program change is proposed, if the Commission addresses the grandfathering issue now, the facts of this case suggest it would be appropriate to treat those customers like the customer-generators in IPC-E-18-15. *Id.* at 7-9.

**b) City of Boise.**

City of Boise states it has four facilities that take service under Schedule 84; the Bown Library, Foothills Learning Center, Fire Station #9, and the Twenty Mile South Farm Administration Building. City of Boise City Comments at 2. The City states the ten-year grandfathering proposal would impact the financial considerations used in developing these facilities. *Id.* City of Boise also states it has 24 irrigation service accounts that could be affected by a decision in this case. *Id.*

City of Boise requests this docket be deferred until the comprehensive study ordered in IPC-E-18-15 is completed, vetted, and approved by the Commission. *Id.* at 3. The City of Boise requests the Commission let customers choose either a two-meter system or a single-meter system. *Id.* City of Boise also requests that current Schedule 84 customers be grandfathered indefinitely because they can help reduce peak load. *Id.* at 4. The City of Boise also requests analysis of the 100 kW cap and meter configuration to be included in the comprehensive review ordered by the Commission in IPC-E-18-15. *Id.*

**c) Idaho Conservation League.**

ICL recommends customers be able to choose between one and two meters. ICL Comments at 2. ICL is concerned that two-meter systems will not comply with the tariff when the grandfathering period expires. *Id.* ICL recommends a grandfathering date that coincides with the implementation of a successor program. *Id.* at 3. ICL notes that Schedule 84 generation accounts for a small percentage of the Company's overall system. *Id.* at 3 – 5. ICL argues that grandfathering existing customers before establishing a successor program would chill the potential for others to buy on-site generation systems, and the Commission should therefore defer a decision on legacy treatment until a successor program is announced. *Id.* at 6. ICL states that the Company has not carried its burden of proof in showing that Schedule 84 customers could not reasonably expect program stability over a 25-year period. *Id.* at 8. ICL points to the Commission's recent rejection of Rocky Mountain Power's proposal to limit legacy treatment for customer-generators to ten years. *Id.* ICL rejects Idaho Power's claim that customers with two meters should lose their grandfathered status if they switch to a single-meter system. *Id.* at 9. ICL recommends the Commission apply the same grandfathering terms that the Commission approved for residential and small general service customers in IPC-E-18-15 and PAC-E-19-08. *Id.* at 8-9.

**d) Russell Schiermeier.**

Mr. Schiermeier owns and operates a 3,200 acre farm outside of Bruneau, Idaho. Russell Schiermeier Comments at 1. He states that power costs are 25 – 35% of his production costs. *Id.* Mr. Schiermeier details the actions he has taken to make his farming operation more energy and water efficient, including installing variable frequency drives, sizing pumps and pipes properly, and participating in the Company's Irrigation Peak Rewards Program and Energy Efficiency programs. *Id.* He states that Idaho Power, and the service they provide, are one of his farm's biggest assets, giving him and other Idaho farmers a competitive advantage over other regions of the country because of the reliable power and water infrastructure. *Id.* at 1, 7.

Mr. Schiermeier installed an 800 kW system in March 2019 in compliance with the 100 kW limit on individual meters and meter aggregation rules in place. *Id.* at 3-4. Mr. Schiermeier states that his system offsets less than 40% of his actual load. *Id.* at 4. Mr. Schiermeier states he designed his net metering system to comply with Idaho Power's net metering rules, to provide the most economical solar production, to minimize system load during peak irrigation times, to minimize the footprint of his system, and to have a long lifespan. *Id.* at 2. Mr.

Schiermeier emphasizes that his system was designed, analyzed, and built to comply with the net metering service offered by Idaho Power. *Id.* at 4-5. Had different rules been in place, such as an export credit rate rather than a 1:1 kWh credit for excess net energy, or different meter aggregation rules, he would have designed and built a different system. *Id.* at 5. Mr. Schiermeier notes that with the large loads created by agricultural pumps and the 100 kW limit on individual meters, the meter aggregation rules are very important in the agricultural setting. *Id.*

Mr. Schiermeier states that Idaho farmers relied on the net metering program offered by Idaho Power for the last 18 years, just like residential and small general service customer-generators in IPC-E-18-15. *Id.* at 6. He states that farmers are looking to control costs and invest in solar based on the current design criteria. *Id.* He states that alignment with the grandfathering ordered by the Commission in IPC-E-18-15 also would be fair for irrigators. *Id.* at 6-7.

**e) Sierra Club of Idaho.**

Sierra Club of Idaho was joined in its comments by the Idaho Clean Energy Association (“SC and ICEA”). SC and ICEA jointly argue that Schedule 84 self-generation provides benefits to all customers by offsetting the Company’s need for additional power at system peak. SC and ICEA Comments at 2. SC and ICEA argue that 100% of the Company’s peak load hours, within the size range of the surrogate avoided resource, fall between 2:00 and 8:00 p.m., when Schedule 84 solar is still contributing to the grid. *Id.* at 7. They note that irrigation customers are not constricted by the orientation of their buildings and more often install single or dual-axis tracking systems, which provide greater capacity benefits than fixed systems commonly found with residential on-site systems. *Id.* at 8-9. SC and ICEA also note that single and dual-axis tracking systems produce significant energy at the same time the Company implements its Peak Rewards Program. *Id.* SC and ICEA note that Schedule 84 customers pay a demand charge and a correspondingly lower energy rate than do residential customers. *Id.* at 10-11. SC and ICEA also present data indicating that irrigators’ load profiles are relatively flat and therefore still pay demand charges even after installing on-site generation. *Id.* SC and ICEA assert that the flat load profile of irrigators means they would consume almost all of their generation during the summer peak period even if the 100 kW cap was replaced with a cap based on maximum load. *Id.* They urge the Commission to defer a decision on grandfathering until a replacement program is approved, thereby allowing more C, I, & I customers to enroll under Schedule 84 and take advantage of federal tax credits and grants, further reduce the Company’s system load, offset on-farm costs, and

reduce the irrigator class contribution to peak before the Company's next general rate case. *Id.* at 11. SC and ICEA urge the Commission to remove the 100 kW cap on individual meter sites and replace it with a cap tied to the individual customer's overall demand. *Id.* at 11-12.

**f) Public Comments.**

The Commission received 97 written comments and heard testimony from 13 individuals at the telephonic public hearing. The Commission appreciates the robust engagement by the farming community during harvest season and other interested members of the public. Reviewing the public comments, a few key themes emerge. The first is that the vast majority indicate that ten years is not a fair grandfathering term, and that the Commission should grant a 25-year term to align the grandfathering period with the investment decisions and the treatment granted residential customers in IPC-E-18-15. Many commenters also urge the Commission to wait until a comprehensive study is conducted and a successor program is announced before cutting off eligibility for grandfathering. Numerous commenters note that the comment period overlaps with the harvest season, an extremely busy time for farmers, and therefore urge the Commission to extend the comment period. Further, many commenters urge the Commission to address the 100 kW cap.

Many commenters ask the Commission to support energy independence and allow farmers to control escalating farm costs. Farmers note that commodity prices and the price of farm inputs do not always align, and therefore the opportunity to control costs is critical to riding out fluctuations in commodity prices. Commenters state that increased on-site solar production would reduce Idaho Power's reliance on coal resources, large dams, and long-distance transmission resources, and contribute to the Company's goal of 100% clean energy by 2045. Commenters note that farmers benefit greatly from net metering without causing detriment to Idaho Power's system or other customers because of the relative size of the systems and the demand charge paid by Schedule 84 customers. Commenters note southern Idaho's abundant solar resource and that solar panels produce energy at the Company's peak load hours.

Testimony provided at the public hearing indicated thoughtful consideration of the program structure before investment decisions were made in on-site generation systems. Detailed descriptions were provided by current and potential Schedule 84 customers of their efforts to control farm costs through increased efficiency measures including the installation of variable frequency drives, participation in the Peak Rewards Program, developing and implementing

advanced water monitoring systems, utilizing federal incentives, and participating in net metering. Farmers indicated that farm infrastructure investments are not made on ten-year horizons and that they purchased systems designed and warranted to last for at least 25 years.

**g) Idaho Power Reply Comments.**

The Company maintains its position that a 10-year grandfathering term for Schedule 84 customers would be reasonable but also acknowledges it would be reasonable for the Commission to evaluate a 25-year grandfathering period for C, I, & I customers. Idaho Power Reply Comments at 12. The Company acknowledges the rationale expressed in Staff's and Russell Schiermeier's comments that C, I, & I customers have been making investments under the same understanding as residential customers in IPC-E-18-15. *Id.* at 12-13. The Company acknowledges that the Commission consistently tries to align net metering programs across utilities, and notes that the Commission's decision in PAC-E-19-08<sup>2</sup> came after the Company filed its Application and the Company therefore did not have the benefit of that information when it filed its Application in this case. *Id.* at 13. The Company also acknowledges that the investments made by the customer-generators in this case are substantial, similar to Schedule 6 and 8 customer-generators. *Id.* at 13-14. In conclusion, the Company states it would be reasonable for the Commission to assess the merits of a 25-year grandfathering period for existing Schedule 84 systems. *Id.* at 14.

The Company states that a decision on grandfathering now for C, I, & I customers would follow the Commission's timing in IPC-E-18-15 and PAC-E-19-08, reiterates its position that a decision now would physically and functionally differentiate existing and new customer-generators, would help clarify for potential customer-generators that the tariff is subject to change, and responds to ICL's allegation that the grandfathering decision in IPC-E-18-15 chilled the market. *Id.* at 8 – 10.

Idaho Power clarifies that its Application does not propose to change meter aggregation rules and that two-meter and single-meter Schedule 84 systems would both have the opportunity to aggregate excess net energy credits. *Id.* at 4. The Company also states that neither ICL nor City of Boise presented any evidence that some customer-generators would choose to install a dual-meter system rather than a single-meter system and noted the additional costs associated with a dual-meter system, and the inability of such a system to offset demand. *Id.* at 4-5. The Company

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<sup>2</sup> PAC-E-19-08 is a Rocky Mountain Power docket filed in June 2019 addressing that utility's net metering program. *See* Order Nos. 34753, 34798.

also states that its interpretation of the proposed Schedule 84 would allow for two-meter systems to continue in operation after the end of the grandfathering period. *Id.* at 5-6. The Company also states that a single-meter only option would be consistent with other net metering interconnection requirements in Idaho. *Id.* at 6. The Company states that the Commission need not decide right now whether a dual-meter system would be consistent with a future billing structure and therefore whether two-meter systems should be allowed to continue operating past the grandfathering date, and that the Company would make a filing to address this later, well before the expiration of the grandfathering period. *Id.* at 6.

The Company states that the 100 kW cap is not at issue in this case, has not been noticed, and has not been fully analyzed and a decision on this issue should occur after program fundamentals, including pricing for exports, have been addressed. *Id.* at 15. The Company states it intends to submit a filing and initiate the comprehensive study ordered in IPC-E-18-15 after the conclusion of this case and IPC-E-20-30 (dealing with smart inverters). *Id.* at 16.

#### **COMMISSION FINDINGS AND DECISION**

The Commission has jurisdiction over this matter under *Idaho Code* §§ 61-501, -502 and -503. The Commission is empowered to investigate rates, charges, rules, regulations, practices, and contracts of public utilities and to determine whether they are just, reasonable, preferential, discriminatory, or in violation of any provision of law, and to fix the same by order. *Idaho Code* §§ 61-502 and 61-503.

Having reviewed the record, we find it is fair, just, reasonable, and non-discriminatory to grandfather existing Schedule 84 customers as of the service date of this Order for a period of 25 years. Doing so aligns the treatment of existing Schedule 84 customer-generators with the treatment the Commission granted to existing Schedule 6 and Schedule 8 customer-generators in IPC-E-18-15. The record reflects existing Schedule 84 customer-generators made investments in their systems with a reasonable expectation of program stability over the expected useful lives of their systems.

We find it prudent to make the determination on grandfathering existing Schedule 84 customer-generators now, rather than waiting until a successor program is approved as many parties and commenters suggested, because it clarifies to potential C, I, & I customer-generators that the program fundamentals are undergoing a comprehensive review and are likely to change. While it may be difficult for potential customer-generators to determine their likely return on

investment without knowing the details of the successor program, we find this consideration is outweighed by the public interest in clarity that the tariff is likely to change. We find that the claimed chilling effect on new customer participation in Schedule 84 during the interim is unpersuasive. Customer-generator decisions are based on many factors and when making future decisions it is important to acknowledge that any tariff may change.

As we did in IPC-E-18-15, we reiterate a key point: tariffs are not contracts and are subject to change upon a finding by this Commission that the proposed change is fair, just, and reasonable and in the public interest. Although the Commission has found it is equitable and legal to grandfather existing customer-generators in IPC-E-18-15, PAC-E-19-08, and now here, legacy treatment is only appropriate in limited circumstances. In this line of cases, we have found that when the customer-generator has made a significant investment in an on-site system based on reasonable reliance of program stability, it is fair, just, and reasonable, non-discriminatory, and in the public interest to allow those customer-generators to recoup the value of their investments over the anticipated life of their investments. Following our pronouncements in the orders in these cases, made after extensive briefing, public testimony, and deliberation, that the program fundamentals are likely to change in the not too distant future, the reliance on long-term program stability will no longer be reasonable given the ongoing evaluation of the programs.

Legacy treatment for existing Schedule 84 customer-generators will be according to the same terms granted Schedule 6 and Schedule 8 customers in IPC-E-18-15: 1) 25 years from the service date of this Order; 2) the grandfathered status stays with the system at the meter site; 3) if the system is offline for over six months, or is moved to another site, the grandfathered status is forfeited; and 4) 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% of the originally installed nameplate capacity, or 1 kW, whichever is greater. *See* Order No. 34546 at 9. We take the term “grandfather” or “legacy treatment” in this specific context to mean that the customer-generator is entitled to continue to take service according to the terms of Schedule 84 in place as of the service date of this Order for a period of 25 years.

The concept is based in investment-backed decisions and the reasonable expectations of the customer-generator. Therefore, it is the system that has been designed and installed to meet the current rules that qualifies for legacy treatment. If a customer wants to switch to a single-meter system, they can do so but they would forfeit the system’s grandfathered status. Similarly, if the

customer wants to expand their system beyond the limits previously stated, the new portion of their system would not qualify for legacy treatment. The Commission adopts the Company's proposal regarding the metering configuration for new systems added to grandfathered systems.

Existing customer-generators are those that have interconnected their system by the service date of this Order, or who have applied for interconnection under Schedule 84 by the service date of this Order and interconnect their system within one year. We do not find the Company's proposals to distinguish among existing customer-generators to be adequately supported. The Company proposes that customers who applied for interconnection with the Company after the Company submitted its Application to the Commission be required to provide proof of a financial commitment in a two-meter system before the effective date of this Order. Application at 6. The Company also proposes that only on-site generation systems that applied for interconnection before May 1, 2020 be allowed to increase the capacity of the grandfathered system by 10% or 1 kW, whichever is greater. *Id.* at 6-7. The Commission finds there is not adequate support in the record to justify deviation from consistent grandfathering criteria.

We find it reasonable to approve the Company's proposal that if a Schedule 8 customer-generator receiving legacy treatment under the orders issued in IPC-E-18-15 increases its demand to move to Schedule 9, that the customer-generator's initial legacy treatment determined in IPC-E-18-15 continues to apply to that customer.

We find that the Company's proposal to switch to a single-meter requirement for all new customer-generators under Schedule 84 is reasonable. A single-meter system reduces customer costs, streamlines administration, and can perform the requisite functions. We cannot ascertain from the record why a new customer would choose a dual-meter system going forward, and therefore do not find the arguments about customer choice convincing. For administrative efficiency and the reasons previously stated, all new customer-generators taking service after the service date of this Order must install a single-meter system.

Finally, we acknowledge the comments submitted regarding the 100 kW cap and meter aggregation rules but decline to address them in this docket. There will be opportunities to address these issues during or after the forthcoming comprehensive study. We thank the parties and public commenters for their participation in this docket and for helping to build a substantial record on the issues before us. We look forward to the forthcoming comprehensive study and continued engagement on these issues.

**ORDER**

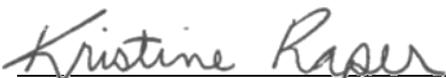
IT IS HEREBY ORDERED that existing customer-generators under Schedule 84 be allowed to continue to net meter on the terms in place on the service date of this Order, as more fully described herein.

IT IS FURTHER ORDERED that all new customer-generators under Schedule 84 after the service date of this Order be required to install a single-meter system.

THIS IS A FINAL ORDER. Any person interested in this Order may petition for reconsideration within twenty-one (21) days of the service date of this Order with regard to any matter decided in this Order. Within seven (7) days after any person has petitioned for reconsideration, any other person may cross-petition for reconsideration. *See Idaho Code* § 61-626.

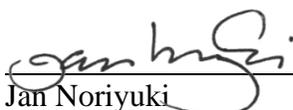
DONE by Order of the Idaho Public Utilities Commission at Boise, Idaho this 1<sup>st</sup> day of December 2020.

  
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PAUL KJELLANDER, PRESIDENT

  
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KRISTINE RAPER, COMMISSIONER

  
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ERIC ANDERSON, COMMISSIONER

ATTEST:

  
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Jan Noriyuki  
Commission Secretary

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