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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO)	
POWER COMPANY'S)	
APPLICATION FOR AUTHORITY)	CASE NO. IPC-E-20-30
TO ESTABLISH TARIFF)	
SCHEDULE 68,)	IDAHO CONSERVATION LEAGUE
INTERCONNECTIONS TO)	
CUSTOMER DISTRIBUTED)	COMMENTS
ENERGY RESOURCES)	

The Idaho Conservation League (ICL) recommends the Commission approve Idaho Power's Application with a few minor modifications. Overall, ICL supports the use of smart inverters to improve power quality for the benefit of solar-owners and Idaho Power's grid. We have reviewed Idaho Power's application and testimony, production responses, and consulted with industry-leading experts at Grid Lab.¹ Our review confirms that Idaho Power's proposal to establish a new Schedule 68 and the proposed inverter settings are reasonable. We recommend Idaho Power clarify the process to verify the correct inverter settings upon installation and provide trainings for installers to ensure adherence to the new Schedule 68. We also recommend the Commission direct Idaho Power to monitor the growth of distributed energy resources and report annually in the Demand Side Management report on opportunities to implement additional smart inverter functions and address distribution circuits experiencing reliability issues.

¹ <https://gridlab.org/mission-approach/>

Adoption of Schedule 68

ICL supports establishing Schedule 68 as the applicable schedule for customer-owned generation. We agree that distinguishing this category of retail customers from other generation sellers is an appropriate clarification. Idaho Power's proposed modifications described by Witness Aschenbrenner on pages 15 through 26 will help clarify requirements and improve program administration.

Smart Inverter Settings

Smart Inverters have the potential to improve the value of distributed energy systems for both customer-owners and the remaining grid. ICL supports the requirement for all customer-owned systems to use smart inverters that comply with IEEE 1547 standards. We appreciate Idaho Power's diligence in filing proposed Schedule 68 within 60 days of the final adoption of the IEEE 1547 and 1547.1 standards. We have reviewed Idaho Power's proposed settings with an eye on the following criteria: ease of implementation, impact on power quality, and the impact on customer-owner. Because this is a relatively new technology and standard, ICL consulted with industry experts at Grid Lab to review Idaho Power's proposal. Grid Lab has worked on the IEEE 1547 standard and related smart inverter settings for utilities and other state commissions. We found this report, *Regulating Voltage, Recommendations for Smart Inverters*, to be particularly helpful for a non-technical audience.² Overall, our review shows Idaho Power's proposed settings are easy to implement, will improve power quality, and will not negatively impact customer-owners.

Non-Export Option

ICL supports Idaho Power's proposed non-export option as applied to systems up to 3 MVA. For larger systems above 3MVA, Idaho Power proposes additional metering and

² <https://gridlab.org/works/regulating-voltage-report/>

communication equipment for all systems partially “to maintain an accurate load and resource forecast”.³ The Company also proposes to require site-specific interconnection studies for these systems.⁴ ICL recommends the Commission direct Idaho Power to only require additional metering and communications equipment if the site-specific studies reveals this is required to avoid unreasonable impacts to the system. Making full use of the site-specific studies to address these larger systems is a better use of resources than a blanket requirement for potentially expensive additional equipment.

Energy Storage Devices

ICL supports Idaho Power’s proposal to allow DC coupled storage that is paired with a generation system to be treated as a single system. We appreciate Idaho Power’s proposal to not apply any additional interconnection requirements on paired storage systems.

Implementation Issues

ICL recommends the Commission direct Idaho Power to do two things to improve the implementation of this new schedule and new technology. First, individual solar installers will have to enter specific software settings in each inverter to implement Schedule 68. To assist with compliance, ICL recommends Idaho Power provide simple education materials and training sessions for all solar installers in the service territory. A simple opportunity could be to work with CED Greentech⁵, the largest distributor of solar system equipment in the area, and the Idaho Clean Energy Association to easily reach all active system installers. ICL also recommends Idaho Power clarify how they will assure correct software settings during system inspections.

³ *Ellsworth at 24.*

⁴ *Ellsworth at 24-25.*

⁵ <https://www.cedgreentech.com/location/boise-id>

Second, we recommend the Commission direct Idaho Power to provide annual reporting to address the growth of distributed energy systems in the area. As Idaho Power explains, customers of all sizes continue to express interest in generation and storage systems. Over time, this changing mix of loads and generation can influence the larger grid. And as the amount of distributed resources grows to significant scale, new opportunities for smart inverter-based services may arise, as Witness Ellsworth alludes to on page 14. To prepare for this rapidly coming future, ICL recommends Idaho Power produce an annual report describing the levels of distributed energy systems, any impacts to distribution circuits, and the potential for additional smart-inverter based functions. ICL recommends this report that addresses customer-owned resources could be included in the annual Demand-Side Management program report.

Conclusion

ICL appreciates Idaho Power's proposed Schedule 68. We recommend the Commission:

- Approve Schedule 68.
- Require Idaho Power to provide education materials and training to solar installers.
- Require Idaho Power to clarify how installers will verify inverter settings.
- Require annual reporting on distributed energy system growth, impacts, and opportunities.

ICL respectfully submits these comments on this 13th day of January 2021,

/s/ Benjamin Otto
Benjamin J. Otto
Idaho Conservation League

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of January, 2021, I delivered true and correct copies of the foregoing COMMENTS to the following persons via the method of service noted:

/s/ Benjamin Otto
Benjamin J. Otto

Electronic mail only (See Order 34602)

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