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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 TO INITIATE A  
MULTI-PHASE COLLABORATIVE PROCESS  
FOR THE STUDY OF COSTS BENEFITS AND  
COMPENSATION OF NET EXCESS ENERGY  
ASSOCIATED WITH CUSTOMER ON-SITE  
GENERATION

Case No. IPC-E-21-21

**CITY OF BOISE CITY'S  
REPLY COMMENTS**

The city of Boise City ("Boise City") submits these formal comments on the proposed scope of the study to be undertaken by Idaho Power ("Company") to comprehensively evaluate the costs and benefits of on-site generation. Boise City submits these reply comments pursuant to Rule 203 of the Commission's Rules of Procedure, IDAPA 31.01.01.203, and pursuant to the Notice of Scheduling, Order No. 35193, issued by the Commission on October 7, 2021.

1. Boise City recognizes and appreciates the collaborative process implemented by the Commission to develop a Study Framework that results in a comprehensive study of the benefits and costs of net excess energy. By incorporating the diverse viewpoints of all parties and members

of the public, the Study Framework can promote a fair, just, and reasonable study phase. Boise City specifically recognizes the Company's incorporation of suggested changes and concerns from parties and the public to its Revised Study Framework, filed as Attachment 1 to the Company's Final Comments. Specifically, Boise City supports the Company's inclusion of the time and location value of exported energy, Revised Framework at 1, avoided fuel price risks, Revised Framework at 3, the identification of avoided environmental costs, Revised Framework at 3, and the avoided capacity value of customer generators with energy storage in the study design, Revised Framework at 2.


2. Boise City recommends the Commission approve Idaho Power's Revised Study Framework with the following considerations incorporated:

- a. Consistent Penetration Levels: The approved Study Framework must utilize consistent and reasonable penetration levels across all relevant aspects of the Study Framework to reflect the impacts of increased customer generation. The Company only identified penetration levels as a variable to be incorporated in the Integration Costs and one environmental benefit section. Revised Study Framework at 3. Staff also noted in their final comments that penetration levels should be factored into the design of the Export Credit Rate. Comments of the Commission Staff at 4.
- b. Carbon Pricing: The approved Study Framework should incorporate the avoided costs of compliance with carbon emissions regulation. *See* Boise City Final Comments at 2.
- c. Comprehensive Climate Risk Scenario: The evaluation of the Export Credit Rate should include model runs using the Climate Change scenario presented

in the 2021 IRP with stressed Western Energy Coordinating Council conditions, increased hydro-electric generation variability, high gas prices, and high customer load growth.

- d. Firmness: The evaluation and potential discounting of the value of net-exported energy based on the Company's stated "non-firm nature of the exported energy" should be limited to the risk of net-excess energy production from customer-generators being removed from the grid as a resource in aggregate. With the well documented and known patterns of solar and wind production across the Company's service territory there is no basis for discounting the value of the net-excess energy produced simply because the energy was generated from a renewable resource.
- e. Data Transparency: All data, assumptions, and inputs in the stack of benefits and costs making up the Company's study of the Export Credit Rate must be made available to the public upon completion of the study. *See* Order No. 34509 at 9.

DATED this 30th day of November 2021.

  
\_\_\_\_\_  
Ed Jewell  
Deputy City Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this 30th day of November 2021, served the foregoing documents on all parties of counsel as follows:

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A handwritten signature in black ink that reads "Michelle Steel". The signature is written in a cursive style with a horizontal line through the middle of the letters.

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Michelle Steel  
Paralegal, City of Boise