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IDAHO PUBLIC  
UTILITIES COMMISSION

Board Chair of the Idaho Clean Energy Association

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER COMPANY'S	)	CASE NO. IPC-E-21-21
APPLICATION TO INITIATE A MULTI-PHASE	)	
COLLABORATIVE PROCESS FOR THE STUDY OF	)	Idaho Clean Energy Association
COSTS, BENEFITS, AND COMPENSATION OF NET	)	
EXCESS ENERGY ASSOCIATED WITH CUSTOMER	)	INITIAL COMMENTS ON STUDY
ON-SITE GENERATION	)	FRAMEWORK

It is our position that this framework (provide September 30, 2021) should be designed to provide the basis for a study that will be detailed and focused on the

***“cost, benefits and compensation of net excess energy associated with customer on-site generation”***

as stated in the IPC-E-21-21 initial application. We reiterate this as we believe that within this framework there are areas of focus that fall outside the value of net excess energy, benefits and compensation and relate directly to utility rate making and profitability methodology that the Company has identified as necessary to evaluate customer on-site generation.

Within the primary objectives of this study that have been suggested by the parties we would like to emphasize that a “fair, just and reasonable” study should be done by a non-bias third party. It is difficult for any person or entity, directly related to or effected by the study, to perform a study without injecting a personal/professional bias. This opinion is supported by the first statement in the “companies’ objectives”;

***“The Company's primary objective of the study process is to establish a sustainable on-site generation offering that limit subsidies by implementing a more equitable pricing and compensation structure.”***

To be clear, the ICEA supports fair compensation for exports, which should resolve the claimed “subsidies” regarding exports. In terms of minimizing subsidies across classes, this study is not the place to presume that reducing one’s usage via on-site generation creates “subsidies” any different than other customers who reduce their usage. IPC-E-18-16 showed that the big dollar subsidies were among

classes other than Schedule 6 & 8 so let's focus on exports.

With that said, it is also important to note in section 2 of the primary objectives it states

***"a. The rates and dollar bill credit to on-site generation who export energy on to the Company's grid (Export Credit Rate - "ECR")."***

This statement is premature as there has not been any decision on whether the value of an export credit is to be quantified as an energy credit "kWh credit" or financially based credit "dollar bill credit". When creating the framework for this study it is important that we do not infer the outcome and this statement presumes that the outcome should be a financially based value for any net excess energy credits.

Another aspect of this study that we feel is missing altogether is aligning it with our federal, state, municipality, and individual goals to developing alternative energy resources. For example, Idaho State Executive Order No. 2020-18 begins with an emphasis on developing energy resources in our own state and noting the importance of having a clean and diverse energy portfolio and customer-owned generation presents opportunities encouraged by Idaho policy. It is the policy of the State of Idaho to promote development of the state's energy resources to increase energy supply in an economically efficient manner while maintaining the integrity of Idaho's natural resources, encourages public dialogue and educating citizens on the importance of the state's clean and diverse energy portfolio and developing Idaho's energy resources will benefit the state by creating diverse and sustainable forms of energy and new job opportunities for Idahoans.

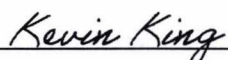
Going back to the title of this study, we should be focused on exports, not consumption. If we were to follow the recommendation of *A Regulator's Guidebook: Calculating the Benefits and Costs of Distributed Solar Generation*, Interstate Renewable Energy Council (IREC). It poses the question on p15, "Q2: WHAT IS BEING CONSIDERED – ALL GENERATION OR EXPORTS ONLY". This guidebook answers that question with the following statement,

***"We recommend assessing only DSG exports to the grid."***

Any costs and benefits associated with exports should be part of the value stack for exports. This study is not the place to estimate how fixed costs might or might not be allocated to customer-generators in a rate case. The opportunity to consider rate designs for consumption and fixed cost recovery was in IPC-E-18-16, and the intervenors in that docket made some great recommendations.

The ICEA appreciates the opportunity to work on this study and is looking forward to future collaboration with stakeholders

Respectfully submitted October 13, 2021

  
Idaho Clean Energy Association

## CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of October, 2021, I delivered true and correct copies of the foregoing SCOPING COMMENTS to the following persons via the method of service noted:

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