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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION

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

COMES NOW, The Industrial Customers of Idaho Power, hereinafter referred to as the "ICIP" and pursuant to Order No. 35193 of the Idaho Public Utilities Commission ("Commission"), and hereby files its "Final" Comments as to "the appropriate scope of the Study Framework . . . to study the costs, benefits, and compensation of net excess energy associated with customer on-site generation."¹

I
INTRODUCTION – BACKGROUND

Idaho Power Company ("Idaho Power") initiated this docket for the purpose of initiating a "comprehensive" study of the costs and benefits of on-site generation as directed in Commission Order No. 34046 in May of 2018. In Order No. 35193 the Commission established

¹ See page 2 of Order no. 35196At p. 2.

the procedural schedule for the parties to recommend an appropriate scope of the study framework to be used in furthering the Commission's ultimate goal of a comprehensive study of on-site generation.² In response, the ICIP filed comments as to the proper scope of study by noting that issues associated with off-site Non-Exporting net metering facilities be included within the scope of the Commission's anticipate "comprehensive" study.³

In response comments, the PUC Staff appears to object to the scope proposed by the ICIP - no other party expressed any objection to the ICIP's proposal. According to the Commission Staff, the ICIP's proposal, "is outside of the scope of 'studying the cost and benefits' of onsite generation."⁴ Although observing that the issue is "important," the Staff offered no explanation and cited to no authorities to support its conclusory assertion that the ICIP's proposal is beyond the scope of this docket.⁵

II OFF-SITE GENERATION FACILITIES ARE ALREADY PART OF THE STUDY AND THE ICIP'S RECOMMENDATION IS NOT EXPANSIVE NOR OUTSIDE OF THE SCOPE OF THIS PROCEEDING

The use of the generic phrase "on-site" generation to describe the practice of net-metering may have confused the Staff's analysis. Idaho Power already provides for, and this Commission has approved, net-metering generators to be aggregated to a single meter not physically located at the site of the customer's generation, (a.k.a. 'off-site' generation). The general rules applicable to meter aggregation are found in Schedule 84 of the Idaho Power's currently approved tariffs. While the concept of meter aggregation is currently artificially

² Id.

³ See ICIP Scope of Study Comments, filed in IPC-E-21-21 on September 15, 2021.

⁴ See Staff Comments, filed in ICIP-E-21-21 on October 13, 2021 at page 16.

⁵ Id.

restricted to semi-contiguous properties⁶ owned by the same entity, the concept of off-site net metering is already firmly grounded in Commission orders and Idaho Power's tariffs and is already available for Schedules 1, 7, 19 and 24.

Thus, the proposal of the ICIP to further examine off-site generation issues as part of this net-metering docket is, by definition, already an essential ingredient or component to the topic at hand. Off-site generation (off site net-metering) is thus well within the Commission's scope of net-metering and is an appropriate topic for discussion in this docket. The ICIP therefore respectfully reiterates its initial request to include this issue among the myriad of topics that are apparently being welcomed to the issues list without controversy.

DATED this 16th day of November 2021



Peter J. Richardson
RICHARDSON ADAMS, PLLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 16th day of November 2021, a true and correct copy of the within and foregoing FINAL COMMENTS OF THE INDUSTRIAL CUSTOMERS OF IDAHO POWER in Docket No. IPC-E-21-21 was served electronically to:

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⁶ The contiguous property requirement is loosely and inexplicably defined to include parcels separated by generically described "public ...rights of way" which presumably includes roads, canals, access easements, highways and etc. Idaho Power No. 29, Tariff No. 101, Third Revised Sheet No. 84-5 at Section 2(a)(iii).

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A handwritten signature in blue ink, reading "Peter Richardson", written over a horizontal line.

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