

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)	CASE NO. IPC-E-21-40
COMPANY’S APPLICATION TO EXPAND)	
OPTIONAL CUSTOMER CLEAN ENERGY)	NOTICE OF APPLICATION
OFFERINGS THROUGH THE CLEAN)	
ENERGY YOUR WAY PROGRAM)	NOTICE OF INTERVENTION
)	DEADLINE
)	
)	ORDER NO. 35304

On December 2, 2021, Idaho Power Company (“Company”) applied for authority to expand its optional clean energy offerings. The Company seeks to (1) rename the existing Schedule 62—Green Power Purchase Program Rider (optional) to Clean Energy Your Way; (2) maintain and expand procurement options for the renewable energy certificate (“REC”) offering under the name Clean Energy Your Way-Flexible (“Flexible option”); (3) establish a regulatory framework for a future voluntary subscription green power service offering under the proposed Clean Energy Your Way-Subscription option (“Subscription option”); (4) offer a tailored renewables option to the Company’s largest customers under a proposed Clean Energy Your Way-Construction option (“Construction option”); and (5) procure associated program renewable resources outside the Commission’s current competitive bidding requirements. The Company requests its Application be processed under Modified Procedure and a procedural schedule be established that would process this matter by April 2022.

Industrial Customers of Idaho Power (“ICIP”) and Idaho Conservation League (“ICL”) petitioned to intervene and on January 5, 2022, the Commission granted their intervention. Order No. 35285. Walmart petitioned to intervene on January 12, 2022, and was granted intervention on January 21, 2022. Order No. 35301.

We now issue this Notice of Application and set a deadline for intervention.

THE APPLICATION

YOU ARE HEREBY NOTIFIED that the Company proposes to rebrand its Green Power program as the Clean Energy Your Way program which it claims will better communicate the existing and proposed new offerings. The Company seeks to rename Schedule 62—Green Energy Purchase Program Rider (optional) to Schedule 62—Clean Energy Your Way (optional).

YOU ARE FURTHER NOTIFIED that the proposed Flexible option will operate similarly to the existing Green Power Program. The Company requests approval to expand its REC purchase options to keep up with demand and to satisfy customers with near-term clean energy goals that can be accomplished with RECs through a Limited Bulk Purchase Option or REC “Sleeve” Option defined on page 8 of the Company’s Application.

YOU ARE FURTHER NOTIFIED that under the Limited Bulk Purchase Option the Company would purchase a limited quantity of RECs (not to exceed \$5,000 at any time) in advance of a customer request with the intent to sell them to interested customers later under individual customer-specific REC sale agreements. The Company would not initiate the next bulk purchase until the prior batch had been sold.

YOU ARE FURTHER NOTIFIED that the Company seeks authority to serve as a “sleeve” for REC transactions with the Company’s customers by connecting customers to non-Company REC purchases. This would work similarly to the Limited Bulk Purchase Option wherein the Company would sell any procured RECs to interested customers at cost, thereby creating no proceeds to pass through the Power Cost Adjustment (“PCA”), and there would be no unsold RECs as the Company would only procure the RECs the customer demands.

YOU ARE FURTHER NOTIFIED that the Company seeks authority to offer a Subscription option where customers “subscribe” to a portion of output from a new renewable resource on the Company’s system. To offer the Subscription option, the Company describes two phases: Phase 1 (this Application) includes requesting authority to offer a voluntary subscription option and Phase 2 (following approval of Phase 1) would involve the Company determining the resource type, size, and location. During Phase 2 the Company would propose specific subscription pricing for the structure approved in Phase 1.

YOU ARE FURTHER NOTIFIED that the Subscription option would be open to any customer, but the Company proposes an individual customer cap of 15 percent of program capacity. Individual subscription size would be based on a customer’s average prior year energy usage. Customers could subscribe at 50 or 100 percent of the average prior year use for either month-to-month or longer terms of 5 years, 10 years, or 20 years and any REC generated by the subscribed resource would be retained and retired by the Company.

YOU ARE FURTHER NOTIFIED that Subscription option pricing would be developed after a resource was selected. The Company proposes the following cost and credit components:

Program Charge: (1) cost of the resource (\$/kWh); (2) integration charges associated with the resource; (3) administration and marketing costs to advertise and maintain the offering; and (4) a term adjustment charge applied in tiers to shorter-term (month-to-month, 5-year, and 10-year) subscribers.¹

Program Credit: For the value that the specific resource would bring to the Company's system, subscribers would receive a credit for both energy and capacity of the program resource.

YOU ARE FURTHER NOTIFIED that under the Subscription option, customers would continue to pay all standard rates and charges applicable to their rate schedule. A Subscription option customer's bill would include four new line items to account for the difference: (1) Subscriber amount (in kWh), (2) Subscriber charge amount, (3) Subscriber credit amount, and (4) net charge.

YOU ARE FURTHER NOTIFIED that the Company believes there is enough initial interest in the Subscription option to fully subscribe a 50–100-megawatt resource.² The Company proposes to sell any unsubscribed RECs and pass the proceeds through the PCA.

YOU ARE FURTHER NOTIFIED that the proposed Construction option will be available to the Company's large customers served by Schedule 19 and Special Contracts. It will operate by integrating a renewable offering into participating customers' service agreements with the Company.³

YOU ARE FURTHER NOTIFIED that the Construction option offers large customers a tailored way to cover 100 percent of their energy use with a new renewable resource(s). The Construction option works by reconciling a customer's energy use against the generation of a renewable resource (or resources) on an hourly basis. Eligible customers could work with the Company to select a renewable resource(s), and provide input on the type, size, and location.

YOU ARE FURTHER NOTIFIED that the Construction option would impact a customer's existing rate structure by creating new cost and benefit streams resulting from the renewable resource(s). The Construction option would work as follows:

- (1) When the renewable resource is not generating the customer continues to take service from the Company at their standard rates.⁴

¹ As anchor tenants of the Subscription offering, full-term subscribers would not pay a term adjustment charge.

² If the Company cannot fully subscribe the offering, Idaho Power proposes to dispatch any unsubscribed renewable generation to its system with the cost of the resource included in broader customer rates and/or the PCA mechanism.

³ The Company does not have the ability to extend these kinds of agreements to Schedule 19 customers.

⁴ This amount is defined as Net Consumption in Attachment 1 to the Application.

- (2) When the resource is generating, the customer pays for all the generation output at an agreed-upon price.
- (3) For the value the resource brings to the Company's system in the form of energy and capacity, the Company credits the customer at an agreed-upon, Commission approved value.
- (4) In any given hour, if the renewable generation exceeds the customer's energy use, the Company credits the customer for that excess at a negotiated value.
- (5) The customer continues to pay all fixed costs present in the customer's energy rate, as well as standard rates, charges and fees for reliable service provided by the Company.

YOU ARE FURTHER NOTIFIED that the Company anticipates that rates and other charges under the Construction option would be approved by the Commission on a case-by-case basis. To meet specific requests, the Company believes that several interested customers may partner under a single agreement to be served under the Construction option. Alternatively, the Company foresees offering tailored options that would serve the needs of interested customers.

YOU ARE FURTHER NOTIFIED that the Company has designed the proposed Construction option to ensure non-participating customers are not affected by the agreements entered between the Company and participating customers under the Construction option.

YOU ARE FURTHER NOTIFIED that for the Subscription and Construction offerings, the Company plans to work with developers to identify resources that meet the demands of participating customers and requests the ability to waive the competitive bidding resource procurement rules as ordered by Order No. 32745.

YOU ARE FURTHER NOTIFIED that the Company filed a proposed Schedule 62 in both clean and legislative format with its Application.

YOU ARE FURTHER NOTIFIED that the Application, Proposed Schedule 62, and direct testimony of Alison Williams are available for public inspection during regular business hours at the Commission's office. These documents are also available on the Commission's web site at www.puc.idaho.gov. Click on the "File Room" tab at the top of the page, then select "Electric Cases" and click on the case number as shown on the front of this document.

YOU ARE FURTHER NOTIFIED that all proceedings in this case will be held pursuant to the Commission's jurisdiction under Title 61 of the Idaho Code.

YOU ARE FURTHER NOTIFIED that all proceedings in this matter will be conducted pursuant to the Commission's Rules of Procedure, IDAPA 31.01.01.000 *et seq.*

NOTICE OF INTERVENTION DEADLINE

YOU ARE FURTHER NOTIFIED that persons who wish to intervene in this matter to obtain the rights of party (e.g., to file formal discovery, or present evidence, or cross-examine witnesses at a hearing) must file a Petition to Intervene with the Commission under the Commission's Rules of Procedure 72 and 73, IDAPA 31.01.01.072 and .073. **Persons who wish to intervene as a party must file a Petition to Intervene no later than 14-days from the service date of this Order.** Such persons shall also provide the Commission Secretary with their e-mail address to facilitate further communications. After the intervention deadline runs, the Commission Secretary shall issue a Notice of Parties that identifies the parties and assigns exhibit numbers to each party. Once the Notice of Parties has issued, Commission Staff shall informally confer with the Company and any intervening parties about how to further process this case and shall then report back to the Commission on a proposed case schedule.

YOU ARE FURTHER NOTIFIED that persons who would like to present their views without parties' rights of participation and cross-examination are not required to intervene but may present their views by submitting written comments to the Commission.

YOU ARE FURTHER NOTIFIED that the following people are designated as the Company's representatives in this matter:

Lisa Nordstrom
Alison Williams
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ORDER

IT IS HEREBY ORDERED that persons desiring to intervene in this matter shall file a Petition to Intervene no later than 14 days from the service date of this Order. Once the deadline has passed, the Commission Secretary shall prepare and issue a Notice of Parties.

IT IS FURTHER ORDERED that, after the Notice of Parties has issued, Commission Staff shall confer with the parties regarding a procedural schedule for this matter.

IT IS FURTHER ORDERED that parties continue to comply with Order No. 35058, issued June 3, 2021. All pleadings should be filed with the Commission electronically and shall be

deemed timely filed when received by the Commission Secretary. *See* Rule 14.02. Service between parties should also be accomplished electronically. Voluminous discovery-related documents may be filed and served on CD-ROM or a USB flash drive.

DONE by Order of the Idaho Public Utilities Commission at Boise, Idaho this 31st day of January 2022.

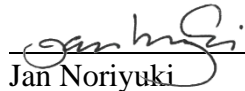


ERIC ANDERSON, PRESIDENT



JOHN CHATBURN, COMMISSIONER

ATTEST:



Jan Noriyuki
Commission Secretary

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