



PUBLIC WORKS DEPARTMENT

MAYOR: Lauren McLean | DIRECTOR: Stephan Burgos

July 13, 2022

Ms. Jan Noriyuki, Commission Secretary
Idaho Public Utilities Commission
11331 W. Chinden Boulevard
Building 8, Suite 201-A
Boise, ID 83714

SUBJECT: Case No. IPC-E-22-12 Clean Energy Opportunities for Idaho's Petition for an order to modify the Schedule 84 100kW & to establish a transition guideline; Written Comments
(Submitted Electronically)

Dear Ms. Noriyuki,

The City of Boise ("City") submits the following comments on the petition submitted by Clean Energy Opportunities for Idaho ("CEO") to modify the Schedule 84 100kW cap and to establish a transition guideline for changes to Schedule 84 export credit compensation values.

The City broadly supports efforts to encourage the continued development of customer-owned distributed energy resources ("DER") and recognizes that the 100kW cap on commercial, industrial, and irrigation ("CI&I") customers inequitably limits on-site DER capacity. The 100 kW cap on CI&I DER capacity is not aligned with the Commission's rationale for allowing DER, which is to allow customers to offset their own energy consumption, and is functionally much more restrictive for CI&I customers than the 25 kW cap on residential customers.

As identified in CEO's petition, there is a near-term system capacity need beginning in 2023. CEO Petition at 7. The City believes all available resources, including customer-owned DER, should be pursued to meet this capacity deficit cost-effectively and efficiently. Additionally, as with smart inverters, the 100kW cap on CI&I on-site generation is independent from the compensation structure for the resource, so the City believes it would be consistent with prior practice for the Commission to consider modifications to the CI&I project eligibility cap outside of IPC-E-22-22. Cf IPC-E-20-30.

In IPC-E-22-22, Idaho Power's Value of Distributed Energy Resources Study (VODER Study) identifies outstanding considerations with interconnection requirements and the need for specific rules to ensure Idaho Power can administer any changes to the cap on CI&I customer generation. See IPC-E-22-22, VODER Study at 99-102. The CEO petition provides the Commission the opportunity to address the questions identified by Idaho Power in the VODER Study in a timely manner.

In sum, addressing the issues raised in CEO's petition could allow CI&I customers to meaningfully help the Company meet its projected 2023 capacity deficit, and could complement rather than detract from or impede the work being done in IPC-E-22-22.

If you have any questions or need additional information, please contact the Climate Action Division of the Department of Public Works at (208) 608-7150.

cc: Kelsey Jae, CEO
Michael Heckler, CEO
Courtney White, CEO
Lisa Nordstrom, Idaho Power
Megan Goicoechea Allen, Idaho Power
Grant Anderson, Idaho Power
Riley Newton, Deputy Attorney General



From: [PUCWeb Notification](#)
To: [Jan Noriyuki](#)
Subject: Notice: A comment was submitted to PUCWeb
Date: Friday, July 15, 2022 4:00:07 PM

The following comment was submitted via PUCWeb:

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Name of Utility Company: Idaho Power

Case ID: IPC-E-22-12

Comment: "Since my prior comments, Idaho Power has completed its "Value of Distributed Energy Resources" study. After a thorough review of the VODER study, I wanted to point out that in regard to the cap, the CEO Petition seems more aligned with Commission orders than the VODER study. The VODER study excluded the cap from its workshop, does not reflect customer comments to the PUC regarding the cap, does not draw lessons from other states, or reference published best practices. The VODER evaluation of a modified cap amounts to a few pages of interconnection, distribution, and implementation matters. Idaho Power proposes to hold "technical workshops with Commission Staff, installers, and other interested stakeholders to discuss proposed tariff modifications" in 2023 (Grant Testimony). I support having those interactive technical workshops as soon as possible, in 2022, facilitated by staff. IPC-E-22-12 provides a better docket for those discussions so that this technical and solvable matter of modifying the 100kW cap can be implemented in fall 2022. I realize the CEO Petition was trying to support a cap which Idaho Power had proposed, and I could support that cap, though now Idaho Power seems to prefer a 2000kW cap (which is also reasonable and common). In its Order on the CEO Petition, I suggest that the Commission allow the technical workshops to also consider revising the cap to be set to an absolute level, either 2000kW, or a table of absolute cap levels for CI&I starting at 1000kW with specific protocols for each level."
