From: PUCWeb Notification
To: Jan Noriyuki
Subject: Notice: A comment was submitted to PUCWeb
Date: Tuesday, July 19, 2022 7:00:07 AM

The following comments were submitted via PUCWeb:

Name: Perry Van Tassell
Submission Time: Jul 18 2022 10:33PM
Email: perrydvt@gmail.com
Telephone: 208-312-1620
Address: 1642W 1100N
Paul, ID 83347

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-12

Comment: "In 2021 we installed 7 sites of solar each one is 100KW. At most of those sites we have irrigation pumps in excess of 500HP but I was limited on only producing 100KW of solar power to off set my electrical needs. Idaho Power has came out and stated in the near future they predict that they will have a short fall of electricity. Idaho's number one revenue is agriculture, why can't we as ag produce solve that problem by allowing us to contract for a period of years like we did in 2021 for net metering without a restriction of 100KW per site. As a Dairymen and Farmer it is important to be able to lock in your energy needs as it also would be a benefit to the State Of Idaho and Idaho Power to keep those dollars in this great state and to be able to have a good reliable source of power. Thanks! Perry Van Tassell Hidden Valley Organic"

From: PUCWeb Notification
To: Jan Noriyuki
Subject: Notice: A comment was submitted to PUCWeb
Date: Tuesday, July 19, 2022 4:00:06 PM

The following comment was submitted via PUCWeb:

Name: Russell Schiermeier
Submission Time: Jul 19 2022 3:50PM
Email: buyhay@gmail.com
Telephone: 208-989-2057
Address: 29393 Davis rd
Bruneau, ID 83604

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-12

Comment: "I have farmed in Sothern Idaho for 12 years, building a farm that utilizes irrigation from deep wells and water from the Snake River. My largest cost has been energy to supply that water the crops. Idaho Power has been essential in the survival and success of my operation, helping me convert to higher efficiency systems to deliver water with the least amount of energy. In, 2018, I worked with Idaho Power to design and install an 800 kW solar system that spreads across my farm to offset approximately 80% of my volumetric energy. I was lucky to have a unique farm that is both contiguous and spread out of many different service points. Aggregation from sites was essential to offset my 4 main pump sites that average about 300 to 500 hp. Under the 100 kW limit, extra infrastructure, complexity and cost were added to the project in order to offset my energy with the Net Metering Program. For a year I participated in IPC-E-19-15 and IPC-E-18-16, so I am not a regulatory expert but am as familiar with the regulatory process as a farmer can reasonably be. A few areas to address for Idaho agriculture, are: 1. There is a discrepancy of residential customers being able to design and build systems that offset their total usage, while farmers are limited to an arbitrary and relatively limited amount when considering irrigation pumps. The 100 kW cap greatly limits design efficiencies and opportunities across farms that are not lucky enough to have smaller pumps or large amounts of meters to utilize. Lifting the cap would not only simplify designs for the farmer, but also for the utility company. Similarly, to the single meter conversion done, this is more of a design criterion and not a VODER issue. I am confident that the VODER will address the necessary cost structures regardless of cap size. 2. With the ongoing issues of energy capacity to the system, why is the ability of agriculture limited instead of utilized. We are encouraged to utilize the PEAK Rewards Program and make energy efficiency upgrades to our systems but are limited in utilizing the Net Metering Program to help minimize our energy impact. Our industry is showing increasing pressure of carbon markets and energy costs; both of which are difficult to address with the current 100 kW cap. 3. Idaho Power has completed its six-month study. There seems to be an assumption that the CI&I cap cannot be revised until after a Study Review phase which the Commission ordered in IPC-E-18-15 in response to residential concerns with export compensation issues. Why is there an assumption that a Study Review phase ordered in a residential docket applies to the CI&I cap, particularly when that docket did not address the residential system size cap? My understanding of the regulatory process is that customers are supposed to be able to weigh in on the matters that impact them. I understand why a study review phase is needed for other

matters in the study, which all relate to export compensation or rates. I do not believe the same process applies to the CI&I cap. During the IPC-E-19-16 comments, many farmers and farming organizations across Idaho voiced their support of the cap being lifted, and this docket prioritizes that concern. 4. Idaho Power proposes that further evaluation is needed to modify the cap, and that technical workshops should be held to do that in 2023. This delay on design criteria severely limits farmers ability to utilize Net Metering as a solution to energy. Why not hold those workshops now, in IPC-E-22-12 so that it can be resolved an farmers have the opportunity to utilize resources in 2022. Farmers in Idaho live or die with our power costs, and we deserve the fair opportunity to manage our costs. Today, we face factors beyond our control which impact our electricity costs, including the repercussions of high input prices, capacity additions by the utility, and a forthcoming rate case. Idaho is supposedly the least regulated state, yet we farmers lack the regulatory freedom to manage our electricity costs. Fair access to technologies such as solar is crucial to our ability to be sustainable industry and survive. As many farmers testified to the PUC in 2020, we are harmed by the delay in addressing the 100kW cap and a lack of predictability or stability of the future export credit rate. I had thought that the record built in that docket would be referenced in the VODER study of the cap, but the study of the pros and cons of the cap did not reference that input from farmers. It seems unfair that the utility can keep making cost additions and earning a return on those additions by collecting revenue from us customers, while irrigators do not have the same opportunity to invest in solar in 2022. Our industry is showing increasing pressure of carbon markets and energy costs; both of which are difficult to address with the current 100 kW cap. I ask the commission to consider granting the CEO petition. Idaho Power suggests holding technical wo"

July 19, 2022

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(703) 674-8637
kbowman@votesolar.org
Interior West Regulatory Director for Vote Solar

Re: Case No. IPC-E-22-12: In the Matter of Clean Energy Opportunities for Idaho's Petition for an Order to Modify the Schedule 84 100 kW Cap

Dear Commissioners,

Vote Solar submits the following comments in support of Clean Energy Opportunities for Idaho's Petition ("CEO Petition") in Case IPC-E-22-12.[1] The CEO Petition proposes to lift the 100 kW cap for commercial, industrial, and irrigation ("CI&I") Idaho Power customer generators in order to allow these customers to install solar projects to offset their entire energy use if usage exceeds the 100kW cap. The Petition also recommends establishing a transition guideline to reduce regulatory uncertainty for customers who install solar in the near term. Approval of the Petition will provide needed relief to CI&I customers looking to reduce their energy costs through on-site generation, allow these customers to contribute to meeting Idaho's future energy needs, and better align with policies and best practices in nearby states.

Vote Solar is a 501(c)3 non-profit, non-partisan organization working to realize a clean energy future through a solutions-driven, people-first approach. We have participated in clean energy and net metering proceedings in over 20 states in order to provide technical and policy expertise to support the growth of robust solar markets. Vote Solar has previously intervened in Case Nos. IPC-E-18-15 (Idaho Power Application to Study Net Excess Energy from Customer On-Site Generation), IPC-E-19-15 (Idaho Power Application to Study Measurement Interval for On-Site Generation Under Schedule 84), and IPC-E-18-16 (Petition of Idaho Power to Study Fixed Costs of Providing Electric Service).

The Idaho Public Utilities Commission ("PUC") is currently in the process of examining the comprehensive costs and benefits of on-site generation and determining appropriate compensation for customers with on-site generation who export energy to the grid (Case No. IPC-E-22-22).[2] We commend the PUC for taking a thorough and measured approach to examining the appropriate value and compensation for exported on-site energy. A fair assessment of the costs and benefits of exported on-site generation is complex and should not be rushed. While the PUC continues to review evidence in this proceeding, there is a near-term opportunity to ensure that CI&I customers have the same ability to offset their own energy usage with distributed solar as residential customers. Investments in distributed

[1] Idaho Public Utilities Commission Case No. IPC-E-22-12, Clean Energy Opportunities for Idaho Petition, April 27 2022.
[2] Idaho Public Utilities Commission Case No IPC-E-22-22, Idaho Power Application to Complete the Study Review Phase of the Comprehensive Study of Costs and Benefits of On-Site Customer Generation, June 30 2022.

generation resources can help CI&I customers save money on their utility bills and improve grid resiliency through local clean energy generation which furthers productivity and economic development across the state. Additionally, secondary level irrigation customers alone account for nearly a quarter of summer peak demand.[3] Allowing CI&I customers to install distributed generation commensurate with their energy needs (rather than an arbitrary 100 kW system cap) creates opportunities for these customers to reduce their substantial demand, which lessens the need for additional investments in rate-based generation and transmission resources and improves grid reliability in the summer months.

The system size cap is a technical design matter that should be addressed separately from the larger questions of rate design and compensation that are currently being investigated in Case No. IPC-E-22-22. The general purpose of a customer generation program is to allow customers to offset some or all of their own energy consumption with on-site generation. Interconnection rules ensure that on-site generation, regardless of size, does not compromise the safety or reliability of the interconnection grid. Idaho Power's interconnection rules specify that all customer generation systems must conform to IEEE 1547 standards and demonstrate that the system is capable of operating safely before they are interconnected to the grid.[4] Idaho Power customers pay a $100 application fee to compensate the utility for the cost of evaluating the customers' proposed on-site generation system and ensuring that it can be connected safely.[5] Customers are also responsible for paying the cost of any system upgrades that are necessary to safely connect on-site generation to the grid, and the utility has the discretion to refuse to connect systems that do not pass inspection. The interconnection process ensures that on-site generation does not threaten the safety or reliability of the grid regardless of the system size or the customer's own energy demand.

Idaho Power's 100 kW system size cap for CI&I customers is exceptionally restrictive relative to its system cap for residential customers and relative to the policies of many other states. Idaho Power reports that the majority of residential customers install systems that are 15 kW or smaller, well below the 25 kW system cap for these customers.[6] However, most on-site generation systems installed by irrigation customers are 95 kW or greater, indicating that the 100 kW system cap is preventing irrigation customers from being able to fully offset their own energy needs through on-site generation.[7] Idaho Power's 100 kW system size cap for CI&I customers is also substantially lower than the maximum system size allowed in nearby states. Commercial systems in Utah and Oregon are capped at 2 MW, commercial systems in Nevada are capped at 1 MW, and systems in Arizona and Colorado are capped at 125% and 200% of a customers' energy usage, respectively.[8]

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[3] Idaho Public Utilities Commission, IPC-E-18-16, Comments of the Commission Staff, January 21, 2020, Page 19.
[4] Idaho Power Company Schedule 68, Sheet No. 68-4.
[5] Idaho Power, "Frequently Asked Questions," https://www.idahopower.com/energy-environment/green-choices/solar-power-options-customer-generation/frequently-asked-questions/.
[6] Idaho Public Utilities Commission Case No IPC-E-22-22, Idaho Power Value of Distributed Energy Resources (VODER) Study, June 30 2022, Page 97.
[7] Ibid, Page 98.
[8] Utah Code 54-15-102, Net Metering of Electricity Definitions, https://le.utah.gov/xcode/Title54/Chapter15/54-15-S102.html?v=C54-15-S102_2014040320140513.
Oregon Revised Statutes 860-039-0010, "Net Metering Kilowatt Limit," https://secure.sos.state.or.us/oard/view.action?ruleNumber=860-039-0010.
Nevada Revised Statutes 774.711 "Net Metering System Defined," https://www.leg.state.nv.us/nRs/NRS-704.html#NRS704Sec769.

The PUC need not wait for the compensation and rate design questions being studied in Case No. IPC-E-22-22 to be resolved in order to address the CI&I customer system cap. The Commission's Order 35284, which the CEO Petition does not contest, narrowly addresses the framework for studying the "costs, benefits, and compensation of net excess energy associated with customer on-site generation."[9] The Company's Application initiating the study framework requests PUC acknowledgement of the study, but anticipates that determination of any changes to rate design or compensation structure will take place in a separate proceeding.[10] It is important not to rush the PUC's investigation into the costs and benefits of on-site generation, and to ensure adequate time for public review and comment. Further delaying consideration of the 100 kW cap will prevent CI&I customers from using on-site energy as a tool to meet their own energy needs and contribute to near-term capacity needs by offsetting their peak energy usage. As such, the CEO Petition to address these specific concerns impeding irrigator access to solar in 2022 through IPC-E-22-12 merits consideration.

Vote Solar recommends that the Idaho PUC:

- Adopt the recommendations of the CEO Petition, adjusting the project eligibility cap for CI&I customers to 100% of a customer's maximum demand and establishing a Transition Guideline that improves predictability and stability of rates by setting a limit to the pace at which the compensation for excess energy may change if and when an Export Credit Rate is implemented;
- Make use of the subject matter notice that IPC-E-22-12 has provided to the public and hold any technical workshops necessary to inform modifications to the project eligibility cap for CI&I customers as soon as possible within that docket.

Respectfully submitted this 19th day of July, 2022,

Kate Bowman
Interior West Regulatory Director
Vote Solar

Arizona Administrative Code R14-2-2302 "Definitions," https://apps.azsos.gov/public_services/title_14/14-02.pdf. Colorado SB21-261, "Public Utilities Commission Encourage Renewable Energy Generation," https://leg.colorado.gov/bills/sb21-261.

[9] Idaho Public Utilities Commission Case No. IPC-E-21-21, Order No. 35284, December 30 2021, Page 2.

[10] Idaho Public Utilities Commission Case No IPC-E-22-22, Idaho Power Application to Complete the Study Review Phase of the Comprehensive Study of Costs and Benefits of On-Site Customer Generation, June 30 2022, Page 8.

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF CLEAN ENERGY OPPORTUNITIES FOR IDAHO'S PETITION FOR AN ORDER TO MODIFY THE SCHEDULE 84 100kW CAP & TO ESTABLISH A TRANSITION GUIDELINE FOR CHANGES TO SCHEDULE 84 EXPORT CREDIT COMPENSATION VALUES	**CASE NO. IPC-E-22-12** **COMMENTS BY IDAHO IRRIGATION PUMPERS ASSOCIATION, INC.**

COMES NOW the Idaho Irrigation Pumpers Association, Inc. ("IIPA") and pursuant to Commission's Order No. 35453 and provides its comments regarding Clean Energy Opportunities for Idaho ("CEO") petition for an order modifying Schedule 84's eligibility cap and establishing a transition guideline setting "a limit to the pace at which the compensation for excess energy may change for Schedule 84 customers if and when an Export Credit Rate is implemented" that has been filed in this case.

I. GENERAL OBSERVATIONS

Over the last five years, IIPA has participated in or followed numerous proceedings that have been initiated and processed to determine the costs and benefits of onsite customer generation. IIPA's principal purpose is to keep electrical irrigation pumping rate increases as reasonable as possible for the irrigation class under Schedule 24. CEO's petition addresses similar matters by addressing issues of concern to the Schedule 84 irrigation onsite-generators to give them certainty in planning investments in irrigation onsite-generation that should reduce their overall electric pumping costs. IIPA supports all cost effective and equitable ways for irrigation pumpers and irrigation onsite-generators to lower their overall electric irrigation input costs.

Idaho Power Company ("IPC") has recently filed their comprehensive study of the costs and benefits of onsite-customer generation (the "Study") in Case No. IPC-E-22-22. IIPA has had a chance to initially review the Study, and believes that the Study's frame work and analyses touches on or directly addresses the concerns that CEO expressed in its Petition. While the collaborative regulatory docket found in Case No. IPC-E-22-22 may not produce a decision as quickly as CEO would like, the IIPA believes that it the appropriate case to address all onsite-generation concerns.

II. CONCLUSION

IIPA recommends that CEO's Petition be consolidated with Case No. IPC-E-22-22. This will give a single forum to address all onsite-generation issues and will ultimately be a more efficient process setting Idaho's onsite-generation policy.

DATED this 19th day of July, 2022.

ECHO HAWK & OLSEN, PLLC

ERIC L. OLSEN

CERTIFICATE OF SERVICE

I HEREBY CERTIFIY that on this 19th day of July, 2022, I served a true, correct and complete copy of the aforementioned document to each of the following, via U.S. Mail or private courier, email or hand delivery, as indicated below:

Jan Noriyuki, Commission Secretary **Idaho Public Utilities Commission** P.O. Box 83720 Boise, ID 83720-0074 jan.noriyuki@puc.idahogov	☐ ☐ ☐ ☐ ☒	U.S. Mail Hand Delivered Overnight Mail Telecopy (Fax) Electronic Mail (Email)
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