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October 26, 2022

VIA ELECTRONIC FILING

Jan Noriyuki, Secretary
Idaho Public Utilities Commission
11331 W. Chinden Blvd., Bldg 8,
Suite 201-A (83714)
PO Box 83720
Boise, Idaho 83720-0074

Re: Case No. IPC-E-22-22
In the Matter of Idaho Power Company's Application to Complete the Study Review Phase of the Comprehensive Study of Costs and Benefits of On-Site Customer Generation & For Authority to Implement Changes to Schedules 6, 8 and 84 for Non-Legacy Systems

Dear Ms. Noriyuki:

Attached for electronic filing is Idaho Power Company's Final Comments in the above-referenced matter.

Due to the voluminous nature of the Study and its 35 appendices, the Company is transmitting these files to the Commission via a secure FTP site. The information to access the FTP site was provided to the parties on June 30, 2022.

Additionally, four (4) bound and three (3) unbound copies of the Study in both clean and redline format will be hand delivered to the Commission today.

If you have any questions about the documents referenced above, please do not hesitate to contact me.

Very truly yours,

Megan Goicoechea Allen

MGA:sg
Attachments

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)	
COMPANY'S APPLICATION TO)	CASE NO. IPC-E-22-22
COMPLETE THE STUDY REVIEW)	
PHASE OF THE COMPREHENSIVE)	IDAHO POWER COMPANY'S FINAL
STUDY OF COSTS AND BENEFITS OF)	COMMENTS
ON-SITE CUSTOMER GENERATION &)	
FOR AUTHORITY TO IMPLEMENT)	
CHANGES TO SCHEDULES 6, 8, AND)	
<u>84</u>)	

COMES NOW, Idaho Power Company ("Idaho Power" or "Company"), and pursuant to the Notice of Schedule, Notice of Workshops, and Notice of Comment Deadlines issued by the Idaho Public Utilities Commission ("Commission") in Order No. 35512, respectfully submits its Final Comments in the above-referenced case as follows.

I. INTRODUCTION

The 2022 Value of Distributed Energy Resources Study ("VODER Study") that forms the subject of this docket represents a significant milestone in Idaho Power's efforts to modernize its on-site generation policies and practices to correspond with the nuances

of the current environment. It was developed and conducted at the Commission's behest as a means of ensuring that the Commission can make a well-reasoned decision on the Company's on-site generation service offering, considering the complexity of the issues and the deep convictions engendered by the topic. Driven by the Commission-approved Study Framework,¹ the ultimate objective of the VODER Study is to evaluate the costs and benefits of on-site generation on Idaho Power's system fairly, objectively, and holistically.

It is important to remember, however, that while the end goal is to establish a more sustainable offering by implementing a more equitable pricing and compensation structure, the current issue to be decided is more limited. That is, having established a formal process for public review of, and comment on, the VODER Study, the question now before the Commission is whether the VODER Study satisfies the directives outlined in Order Nos. 34046, 34509, and 35284.² To that end, as more fully set forth herein, the VODER Study complies with the Commission's requirements for a comprehensive study of the costs and benefits of on-site generation on Idaho Power's system guided by public comment and participation, and the Company respectfully requests that the Commission acknowledge it as such.

¹ *In the Matter of Idaho Power Company's Application to Initiate a Multi-Phase Collaborative Process for the Study of Costs, Benefits, and Compensation of Net Excess Energy Associated with Customer On-Site Generation*, Case No. IPC-E-21-21, Order No. 35284 (Dec. 30, 2021).

² *In the Matter of Idaho Power Company's Application for Authority to Establish New Schedules for Residential and Small General Service Customers with On-Site Generation*, Case No. IPC-E-17-13, Order No. 34046 at 31 (May 9, 2018); *In the Matter of the Application of Idaho Power Company to Study the Costs, Benefits, and Compensation of Net Excess Energy Supplied by Customer On-Site Generation*, Case No. IPC-E-18-15, Order No. 34509 at 17 (Dec. 20, 2019); and Case No. IPC-E-21-21, Order No. 35284 at 32-33.

II. PROCEDURAL BACKGROUND

In submitting the VODER Study to the Commission in June 2022, the Company proposed a procedural schedule including time for public workshops and comments that would position the Commission to issue an order directing changes to the on-site generation service offering, including compensation structure (i.e., measurement interval and export credit rate) by the end of 2022. After considering requests of intervening parties, the Commission ultimately adopted a more protracted procedural schedule for processing this case, which initially focuses on the sole issue of whether the VODER Study satisfies the previous Commission directives and included several opportunities for written comments, additional workshops, and three public hearings on this issue.³ The matter of implementation of potential modifications to the Company's on-site generation service offering will be addressed subsequently.

The Company appreciates the Commission facilitating an interactive process as well as the level of public and stakeholder engagement during this proceeding. Pursuant to the Commission's scheduling order,⁴ initial and reply comments have been submitted by the Company and the following parties: Commission Staff ("Staff"); Clean Energy Opportunities for Idaho ("CEO"); City of Boise; Idaho Conservation League ("ICL"); and Idaho Irrigation Pumpers Association, Inc. ("IIPA"). In addition, over 600 public comments have been received. ICL included a critique of the VODER Study performed by a California consulting firm, Crossborder Energy, as an attachment to their Initial Comments that was commissioned by ICL, other environmental groups, and solar companies:

³ Order Nos. 35512 and 35558.

⁴ Order No. 35512.

“Independent Review of Idaho Power’s *Value of Distributed Energy Resources Study*” (“Crossborder Review”). The Crossborder Review was the focus of the Company’s Reply Comments, which set forth the numerous issues with that report, explained why it would not lead to fair and equitable rates, and ultimately requested the Commission reject it. The Company reserved its Final Comments to address the remainder of the written comments.

In preparing the VODER Study and initiating this docket, it was the Company’s intent to be guided and informed by feedback and input from the parties to this case and members of the public first, as it refines and clarifies the VODER Study and later, as it develops its implementation recommendation. As noted in its Initial Comments, the Company identified several areas of the VODER Study that could benefit from refinement based on the input and recommendations received to date through workshops and written comments, and accordingly, it planned to clarify and refine the information in its Final Comments based on the guidance received throughout the study review process.

The result of that effort is the October 2022 VODER Study filed with these Final Comments, which includes modifications, edits, and additions as more fully detailed herein, incorporating stakeholder and public recommendations for modifications or additions to the VODER Study where appropriate. When referring to a specific version, these Final Comments will refer to the study in terms of when it was filed (i.e., June/October 2022 VODER Study). Consistent with the scope of this proceeding, the October 2022 VODER Study does not address those recommendations or considerations set forth in comments that relate to implementation, which will be more appropriately considered in the second phase of this docket, following the Commission’s

acknowledgement of the October 2022 VODER Study. Having now been vetted, informed, and enhanced by feedback from the public and stakeholders, the Company believes the October 2022 VODER Study provides a solid foundation to proceed to the next phase of the docket relating to implementation.

III. THE REVISED STUDY

The Company appreciates the robust review undertaken by parties to the case. Notably, Staff recommended the Commission acknowledge the VODER Study, contingent on Staff's recommended revisions to an amended study,⁵ and no party recommended the Commission should reject it. The Company has worked diligently over the course of this proceeding to incorporate the concepts and methods presented by parties in comments and by the public through public workshops and comments into the October 2022 VODER Study. As such, accompanying this filing are two attachments:

- **Attachment 1** is the October 2022 VODER Study that incorporates modifications into a "clean" version. The Company has also resubmitted all appendices (those that have changed, are new, and all other unmodified appendices) so the public and the Commission have a comprehensive VODER Study on the record for review.
- **Attachment 2** is a version of the October 2022 VODER Study that has "tracked changes" to show all modifications, edits, and additions that were incorporated after the June 2022 VODER Study was submitted.

Table 1 provides a general overview of the modifications the Company made to the October 2022 VODER Study.

⁵ Staff Initial Comments at 20 and Staff Reply Comments at 9.

Table 1

Summary of Modifications and Additions to October 2022 VODER Study

Item	Section	Topic	Description	Other Comments
1	3.2	Measurement Interval	•Addition of Net Billing hourly measurement interval analysis for Schedule 84 customers	•New Appendix 3.5 and 3.6 •New Figures 3.17 - 3.20
2	4.1	Avoided Energy	•Clarified the illustrative nature of the time periods used for the energy price inputs used in the study and explores the advantages and disadvantages of actual real-time market prices	
3	4.1.2.2 4.1.2.3	Avoided Energy: Seasonal Time Variant ECR	•Additional explanation and data that supports evaluation of "on-peak" and "off-peak" time periods for exported energy from customer-generators	•New Appendix 4.8 and 4.9 •New Figures 4.4 and 4.5
4	4.1.3	Avoided Energy Costs: Firm v. Non-Firm	•Additional explanation of the data that supports the firm to non-firm energy adjustment	
5	4.1.4	Avoided Energy: Transmission Charge	•Additional analysis on the evaluation of the need for a transmission or wheeling charge for the ECR	
6	4.1.5	Avoided Energy: Fuel-Cost Hedge Benefit	•Additional analysis on the evaluation of a fuel-cost hedge benefit and other methods discussed by stakeholders	•New Figure 4.7
7	4.2.1.3	Avoided Generation Capacity	•Additional analysis on strengths and weaknesses of other avoided generation capacity methods evaluated (e.g., PCAF)	•New Figure 4.9
8	4.2.3.1	Avoided Generation Capacity	•Clarified the rationale for utilizing the SCCT for the levelized cost for valuing capacity	
9	4.3.3	Transmission & Distribution Deferral	•Added discussion of other transmission and distribution deferral methods mentioned by stakeholders	
10	4.4.1	Avoided Line Losses	•Added clarification of the concepts of marginal, average, and peak line losses •Clarified assumptions and calculations for average line losses that tie to the Company's line loss study and how line losses are addressed for both capacity and energy	•New Figure 4.17 - 4.19; Revised Figure 4.20
11	4.5	Avoided Environmental Costs	•Included additional detail about carbon price adders in Idaho Power's IRP prices and requirements to obtain and track renewable energy credits	
12	4.6	Integration Costs	•Clarified the methods and results of Idaho Power's Variable Energy Resources Integration Cost Study	
13	5.2	Avoided Generation Capacity	•Added discussion regarding capacity deficiency year and impact to the valuation methodology	
14	6.4	Compensation Structure	•Addition of Net Billing hourly compensation structure bill impact analysis for Schedule 84	•New Appendix 3.5 and 3.6 •New Figures 6.7 - 6.10
15	9.1 9.2	Project Eligibility Cap	•Included additional discussion regarding evaluation of existing cap and evaluation of modified cap and consideration for safety and reliability factors	•New Figure 9.1 - 9.3

In the sections that follow, the Company outlines each of the modifications or additions that were made in response to specific party recommendations. Throughout responding to discovery, discussing the VODER Study at its public workshop, and reviewing and responding to comments, the Company also identified several areas of the June 2022 VODER Study that may benefit from minor revision, new analysis, or expanded discussion. In sum, the Company has incorporated many edits to the October 2022 VODER Study, some of which are intended to provide clarity and enhance readability and understandability of the materials and many of which were in response to feedback received by parties or the public. To assist in the Commission's review, the Company has organized the following in order of how the topics appear in the VODER Study.

A. Measurement Interval

In the June 2022 VODER Study, the Company presented information quantifying the impact of moving from net energy metering ("NEM") to net billing, under both an hourly and a real-time measurement for Schedule 6 and 8 customer classes. The Company did not perform a similar assessment for Schedule 84 customers, as nearly all existing Commercial, Industrial, and Irrigation ("CI&I") customers taking service under Schedule 84 interconnected under a two-meter configuration and were granted legacy treatment (i.e., grandfathered) by the Commission in Case No. IPC-E-20-26.⁶ However, the Company had provided hourly meter data for these customer segments with Appendix 3.4 to the June 2022 VODER Study. In preparing responses to discovery, the Company

⁶ *In the Matter of Idaho Power Company's Application for Authority to Modify Schedule 84's Metering Requirement and to Grandfather Existing Customers with Two Meters*, Case No. IPC-E-20-26, Order No. 34854 (Dec. 1, 2020) and Order No. 34892 (Jan. 14, 2021).

determined that while the majority of the customers currently taking service under Schedule 84 may have been granted legacy treatment, presenting an analysis similar to that which was completed for Schedules 6 and 8 may provide the public, parties, and the Commission information that may be informative in the implementation phase of this proceeding. As such, the Company has amended Section 3 of the October 2022 VODER Study to include a discussion about the impact of moving from NEM monthly measurement to a net billing hourly measurement for CI&I customers. The Company has also developed two new appendices which accompany the October 2022 VODER Study, Appendix 3.5 and 3.6, the 2021 Measurement Interval and Bill Impact for Schedule 84 commercial and irrigation customers, respectively.

B. Export Credit Rate

Several parties made recommendations regarding the valuation of the Export Credit Rate (“ECR”). The Company has incorporated the party recommendations as follows:

Avoided Energy

Generally, the feedback received related to the avoided energy component of the ECR mostly centered around implementation recommendations. While no party recommended an alternative method be considered from the three that were contained in the June 2022 VODER Study (i.e., IRP, ICE Mid-C, and ELAP), there were comments that primarily centered around the timeliness of updating inputs. For example, CEO noted “rather than a weighted average, avoided energy could be credited with real-time prices”⁷ and highlighted that if real-time market prices are not used for valuing exports, “the

⁷ CEO Initial Comments at 2.

method should use recent market prices rather than three years of historical market prices.”⁸ CEO requested the VODER Study be updated to discuss the different options for implementation (e.g., hourly, one-year average, or multi-year average) and to discuss the tradeoffs between accuracy, stability, and predictability that each alternative provides.⁹ The October 2022 VODER Study incorporates several updates to Sections 3.1 and 5.1 to clarify the considerations CEO highlighted.

In their Initial Comments, Staff recommended the VODER Study be amended to present data and analysis to inform an energy-based differentiated ECR and include additional discussion regarding the non-firm energy adjustment.¹⁰ CEO’s Initial Comments suggested that the VODER Study should be modified to “acknowledge the firmness value that the Company, PUC Staff, and signatory parties found in the prior study.”¹¹ The October 2022 VODER Study has been revised to incorporate additional data and information to support an energy-based differentiated ECR and the non-firm adjustment in Sections 4.1.2.2 and 4.13, respectively; however, the VODER Study does not include a value agreed upon by a limited number of parties to a settlement that was rejected by the Commission.¹²

Staff also recommended the Company modify the VODER Study to include an “analysis of the cost to move exports to the market during the timeframe that customer-

⁸ CEO Initial Comments at 2.

⁹ CEO Reply Comments at 7.

¹⁰ Staff Initial Comments at 7-8.

¹¹ CEO Initial Comments at 3.

¹² See Case No. IPC-18-15, Order No. 34509 at 6.

generators export onto the Company's system."¹³ A discussion has been added to Section 4.1.2.2 of the October 2022 VODER Study addressing Staff's recommendation.

In their Reply Comments, Staff recommended the Company amend the VODER Study to include a "detailed discussion on the fuel-cost hedge benefit" suggesting it should "explain how fuel-cost hedge benefits relate to each of the proposed sources for energy valuation, as well as the advantages and disadvantages of the Maine PUC valuation method."¹⁴ ICL indicated "the VODER study is incomplete without substantive discussion of fuel hedging benefits from DER development," and the City of Boise similarly recommended that an "evaluation of price-risk hedge or similar methodology be incorporated in any ECR where the avoided cost of energy is not directly tied to real-time hourly market conditions."¹⁵ In their Reply Comments, CEO recommended "the updated VODER study should reflect that there are methodologies for assigning value to this component of the ECR."¹⁶ Finally, in their Reply Comments, IIPA indicated they do not advocate for fuel pricing hedging, stating this activity does not bring value to customers."¹⁷ To address concerns raised by the parties, the October 2022 VODER Study more comprehensively addresses fuel-price risk in a new section (Section 4.1.5).

¹³ Staff Reply Comments at 4.

¹⁴ *Id.* at 4-5.

¹⁵ City of Boise Initial Comments at 3.

¹⁶ CEO Reply Comments at 6.

¹⁷ IIPA Reply Comments at 11.

Avoided Generation Capacity

In their Initial Comments, Staff noted the VODER Study complied with Order No. 35284 for determining the avoided cost of capacity component in the ECR “with two exceptions,” indicating the VODER Study should be amended to: (1) address the impact to the avoided cost of capacity as the first deficit year changes, and (2) update the method used to calculate the avoided capacity cost for the seasonal time-variant scenario.¹⁸ In their Initial Comments, ICL was critical of the use of a simple cycle combustion turbine (“SCCT”) as the basis for valuing the avoided generation capacity component, suggesting the resource was selected “without explanation, analysis, or context,”¹⁹ and highlights year-over-year variability that may result from an Effective Load Carrying Capability (“ELCC”) based method, finally recommending the VODER Study address “the much simpler peak capacity allocation factor (“PCAF”) calculation as an alternative method to cure these defects.”²⁰

In their Reply Comments, Staff provided three additional recommendations for amending the VODER Study, recommending it include additional analysis and explanation for: (1) strengths and weaknesses for determining capacity contribution using different methods, including the PCAF, (2) the basis for selecting the proper surrogate resource for valuing capacity, and (3) the planning reserve margin (“PRM”) and its non-relevance in valuing capacity contributions.²¹ In its Reply Comments, IIPA points out “the

¹⁸ Staff Initial Comments at 9, 21.

¹⁹ ICL Initial Comments at 5.

²⁰ *Id.* at 6.

²¹ Staff Reply Comments at 10.

PCAF overestimates capacity contribution because it does not scientifically identify hours where IPC is expected to be in capacity deficit,” and highlights that the PCAF “is neither widely used nor a mathematically sound measure of capacity contribution.”²² Finally, IIPA refuted ICL’s suggestion that a battery would be a more reasonable basis for the avoided capacity valuation and similarly noted grossing up capacity by the PRM, as suggested by the Crossborder Review, would be inappropriate.²³

The Company has included analysis and discussion as recommended by the parties in the October 2022 VODER Study. Sections 4.2.1.3, 4.2.2.1, and 4.2.3.1 have been added or modified to address each of the suggestions, notably highlighting several important considerations to be evaluated by policy makers who may consider implementing a PCAF-type method for avoided capacity costs.

In its Reply Comments CEO recommended that the VODER Study be amended “to clarify that the real-time contribution to peak can be used to accurately calculate ECR capacity value components even in the event an hourly netting period is selected for billing purposes.”²⁴ This suggestion was in response to Staff noting that “the measurement on a real-time basis is more accurate than on a hourly basis.”²⁵ CEO’s recommendation is more appropriately considered in the implementation phase of the case; however, the Company highlights it would be inappropriate for a valuation methodology to be based on one method and the billing construct to be based on a less granular measurement, as

²² IIPA Reply Comments at 5-6.

²³ *Id.* at 7.

²⁴ CEO Reply Comments at 7.

²⁵ Staff Initial Comments at 6.

CEO suggests. As demonstrated in the VODER Study, the ECR will be higher if calculated under a real-time measurement interval (i.e., there will be more exports under a more granular measurement, which will lead to a higher value), but it would be a mismatch to then apply an ECR valued under one measurement interval (such as real-time) to exports quantified under a different measurement interval (such as net hourly). While the Company does not believe CEO's suggestion should be reasonably considered, it is more appropriate for CEO to raise this issue in the implementation phase of the case.

Avoided Transmission & Distribution ("T&D") Capacity

The June 2022 VODER Study presented a single method for determining the value from customer exports in deferring or delaying the need to invest in new T&D infrastructure. This method was singularly presented because the Company has the historical and projected data necessary to model the impacts of customer-generation on deferring T&D capacity. The method presented in the June 2022 VODER Study was found by industry expert Kurt Strunk, Managing Director at NERA Economic Consulting, to be "the most targeted analysis possible and is most consistent with the established goal that pricing should reflect cost causation."²⁶ The Company agrees with Mr. Strunk's opinion. In its Initial Comments, Staff found that the Study complied with Order No. 35284 for the evaluation of avoided T&D capacity costs and "provided a credible method to assess exports that contribute to avoiding capacity limits on each segment of the T&D systems, and it provided detailed information to support its analyses."²⁷ IIPA also

²⁶ Affidavit of Kurt G. Strunk at 8.

²⁷ Staff Initial Comments at 10.

supported the use of the method presented in the June 2022 VODER Study.²⁸ In its Initial Comments, ICL was critical of the method utilized in the VODER Study and suggested that the “NERA regression model used by Crossborder fits incremental T&D investments to historic peak load growth, allowing projection of future costs and those avoided by peak load reduction.”²⁹

The Company previously addressed the inappropriateness of utilizing the methods highlighted in the Crossborder Review in its Reply Comments filed in this case.³⁰ Mr. Strunk, NERA’s Managing Director found: “Crossborder Energy’s estimates of Idaho Power’s avoided transmission and distribution investment attributable to behind-the-meter solar exports are not accurate, are overstated, and are based on an inappropriate implementation of marginal costing techniques.”³¹ In its Reply Comments, IIPA’s expert witness noted many of the same issues identified by the Company and Mr. Strunk, ultimately finding “there are numerous issues with the ICL’s regression approach to avoided cost.”³² However, in Reply Comments, Staff and CEO both recommend the Company amend the VODER Study to include a discussion of alternative methods that may be used in evaluating avoided T&D capacity costs.³³ Lastly, the City of Boise

²⁸ IIPA Initial Comments at 6.

²⁹ ICL Initial Comments at 7.

³⁰ Idaho Power Reply Comments at 14-20.

³¹ Affidavit of Kurt G. Strunk at 7.

³² IIPA Reply Comments at 8.

³³ CEO Reply Comments at 8-9 and Staff Reply Comments at 7.

recommended the Company modify the Study to include a discussion about what they refer to as “an approved tariff approach.”³⁴

As a result of the feedback from the parties on this issue, the October 2022 VODER Study introduces a new section (Section 4.3.3) where the recommendations have been included and/or addressed.

Avoided Line Losses

Several parties recommended additional discussion be included in the avoided line loss section of the VODER Study. Specifically, Staff noted: (1) it was unable to reconcile the losses utilized in the June 2022 VODER Study to the 2012 Line Loss Study, (2) it could not identify how line losses were attributed to avoided capacity, and (3) if another method for determining avoided generation capacity was utilized, the line loss factor would need to be explicitly applied.³⁵ ICL referenced the Crossborder Review, suggesting the line losses applied in the June 2022 VODER Study were understated.³⁶ IIPA raised a concern that certain line losses (i.e., transmission line losses) may already be included in the ELAP prices, so they may already be reflected in those energy prices.³⁷

In Reply Comments, Staff further clarified its request for an amended VODER Study to include: “the concepts of marginal line losses, average line losses, peak line losses, and energy line losses, to resolve any ambiguity and overlap between these

³⁴ City of Boise Reply Comments at 2.

³⁵ Staff Initial Comments at 11.

³⁶ ICL Initial Comments at 8.

³⁷ IIPA Initial Comments at 7.

concepts.” IIPA suggested the results in the Crossborder Review were incorrect, stating “the Crossborder study provides no supporting evidence and utilizes flawed logic.”³⁸

The Company has updated Section 4.4 in the October 2022 VODER Study to include a discussion about transformer line losses and included Figure 4.20 to demonstrate how the line losses applied against the avoided energy and capacity components of the ECR were quantified.

Avoided Environmental Costs

Staff’s Initial Comments found the June 2022 VODER Study complied with previous Commission orders related to other potential avoided costs, with “one minor exception,” recommending “that the information from the Response to Production Request No. 46 [explaining the requirements to obtain and track Renewable Energy Credits (“REC”) for customer-generators] be included in an amendment to the Study to provide transparency to the public.”³⁹ CEO maintains “customers with self-generation who export to the Company should have the option to sell to the utility the environmental attributes of their exports,” ultimately suggesting the ECR be increased to reflect the value of the environmental attributes associated with their generation.⁴⁰ ICL claimed in its Initial Comments that “the social cost of carbon emissions, health benefits of reduced air pollution, land use costs, local economic benefits, reliability and resiliency, and customer

³⁸ IIPA Reply Comments at 10.

³⁹ Staff Initial Comments at 11-12.

⁴⁰ CEO Initial Comments at 4.

choice are all quantifiable, yet not offered or analyzed,” and it therefore supported the Crossborder Review’s quantification of these attributes of \$87.20/MWh.⁴¹

In Reply Comments, IIPA takes the position that “no environmental attributes should be incorporated into the net export rate” because “all environmental attributes of the net exporter should be retained by the net exporter,” further pointing out that valuing these types of attributes in an ECR would lead to “double counting.”⁴² Finally, CEO indicates in its Reply Comments that it supports Staff’s recommendation for the VODER Study to be updated to “provide information related to the intricacies and requirements to obtain and track RECs, including a review of what quantity of exports from a particular customer would warrant incurring the costs of registering and recording those exports as RECs.”⁴³ Section 4.5 of the Study has been revised to provide clarity on Idaho Power’s IRP carbon price adder and adds discussion regarding the intricacies and requirements to obtain and track RECs.

Integration Costs

In their Initial Comments, Staff indicated they believe the June 2022 VODER Study complied with the Commission-approved Framework in its evaluation of integration costs, noting: “the results of [the 2020 Variable Energy Resource Integration Study] are adequate for the VODER Study analysis because the baseline scenario was targeted to 2023 and it reasonably approximates the existing resource portfolio.”⁴⁴ Staff also pointed

⁴¹ ICL Initial Comments at 1.

⁴² IIPA Reply Comments at 11.

⁴³ CEO Reply Comments at 9.

⁴⁴ Staff Initial Comments at 12.

out “[t]his component does not have any options to consider” and highlighted that the Company has committed to updating its Variable Energy Resource (“VER”) Integration Study as part of the 2023 or 2025 IRP.⁴⁵ In their Initial Comments, ICL suggested the 2020 VER Integration Study cannot be relied on because it is “dated,”⁴⁶ pointing to the addition of *future* resources that, in ICL’s opinion, may lower the costs associated with integrating solar. ICL suggested a use case from the 2020 VER Integration Study that produces a lower result, which they note the Crossborder Review concurs.⁴⁷

In their Reply Comments, CEO indicated the ICL Initial Comments and the Crossborder Review warrant further discussion in the VODER Study.⁴⁸ The October 2022 VODER Study expanded the discussion in Section 4.6.2 about why the integration study base case scenario (Case 1) most aligns with the Company’s current system.

C. Compensation Structure

Staff notes that while the information contained in this section was not outlined in a prior Commission order, it is “confident the material presented is transparent, understandable, and provides impacts to current non-legacy customer-generators.”⁴⁹ As noted in the “Measurement Interval” section, the Company had previously only included a bill impact analysis for Schedule 6 and 8 customers when the June 2022 VODER Study was submitted. While nearly all of the CI&I customers taking service under Schedule 84

⁴⁵ *Id.* at 12-13.

⁴⁶ ICL Initial Comments at 8.

⁴⁷ *Id.* at 9.

⁴⁸ CEO Reply Comments at 10.

⁴⁹ Staff Initial Comments at 13.

in 2021 had previously received legacy treatment, the Company has completed a bill impact analysis for those customers, assuming a transition to net billing with an hourly measurement. The discussion in Section 6.4 has been expanded to include Schedule 84 customers and Appendix 3.5 and 3.6 have been added to the October 2022 VODER Study.

D. Class Cost-of-Service

Staff's Initial Comments found the class cost-of-service presented in the June 2022 VODER Study "complied with Order No. 35284," stating "the Company provided information that is accurate, transparent, understandable, and showed results that the Company has not recovered its authorized revenue requirement from customer-generators."⁵⁰ Through discovery, Staff asked clarifying questions about the treatment of Schedule 84 customers in the class cost-of-service study. The October 2022 VODER Study has been modified to include the clarifications addressed through discovery in an expanded discussion in Section 7.

In its Initial Comments, CEO took exception with a single statement in the VODER Study, suggesting because the Company developed the VODER Study, it was done "through a one-way lens,"⁵¹ evidenced by the statement "opportunity exists to better align the pricing structure with the underlying cost structure."⁵² The October 2022 VODER Study modifies the above-referenced statement. No other party submitted comments regarding this section.

⁵⁰ *Id.* at 14.

⁵¹ CEO Initial Comments at 5.

⁵² *Id.* (referencing June 2022 VODER Study at 86).

E. Project Eligibility Cap

In its Initial Comments, Staff found the Project Eligibility Cap section in the June 2022 VODER Study complied with the Commission-approved Study Framework, but suggested additional factors to be considered in setting the cap.⁵³ Specifically, Staff recommended the Company amend the VODER Study to incorporate: (1) information provided through discovery requests, (2) the policy factors to be considered when establishing the project eligibility cap, and (3) an evaluation of potential gaming and manipulation between Public Utilities Regulatory Policies Act of 1978 (“PURPA”) and customer-generation. In their Reply Comments, Boise City agreed with Staff’s recommendations to amend the Study, however they requested that a discussion about potential gaming between PURPA and customer-generation be excluded from the VODER Study.⁵⁴

In its Initial Comments, CEO highlighted what it characterized as an absence of a discussion required by Commission Order No. 35284 regarding “the pros and cons of setting a cap according to a customer’s 100% and 125% demand as opposed to predetermined caps of 25 kW and 100 kW.”⁵⁵ However, CEO pointed out that information received via discovery and a technical workshop made progress in addressing that deficiency, and in its Reply Comments agreed with Staff’s suggestions to amend the VODER Study with information received through discovery.⁵⁶

⁵³ Staff Initial Comments at 14.

⁵⁴ City of Boise Reply Comments at 4.

⁵⁵ CEO Initial Comments at 6.

⁵⁶ CEO Reply Comments at 12.

The October 2022 VODER Study incorporates the information requested by Staff and CEO in their respective comments. The Company notes that CEO requested certain information provided throughout discovery not be added, due to concerns that it may be misleading (specifically requesting the Company not include data about the number of service points that are currently below/above the current cap).⁵⁷ It is important to note that the Company administers each of its tariffs – including the on-site generation tariffs – according to service points. Demonstrating how many service points may currently be limited by the existing project eligibility caps may be informative for the Commission, parties, or members of the public in understanding how the cap is currently applied. To address CEO's concerns that the information could be misleading, the October 2022 VODER Study includes a discussion about the existing caps, how they are administered, and how the information should not be interpreted to suggest a 1-1 relationship between service point and customer.

In its Initial Comments, IIPA was supportive of a modified cap, contingent upon both the ECR and base rates being designed to address the subsidies of customer generation.⁵⁸ However, IIPA's Reply Comments further refined its recommendation to suggest it would be open to a modified project eligibility cap so long as some safeguards are established to ensure there is no gaming opportunities for PURPA developers to circumvent that process.⁵⁹ These issues are important and should be addressed by parties in the implementation phase of the case.

⁵⁷ *Id.*

⁵⁸ IIPA Initial Comments at 8.

⁵⁹ IIPA Reply Comments at 4.

F. Other Areas of Study

In its Initial Comments, Staff highlighted that the Company included additional items in Section 10.2 of the June 2022 VODER Study that were “not required to be studied in Order No. 35284,”⁶⁰ pointing out that this section details resources available to the public on the Company’s website to assist customers in making informed decisions about the economics of on-site generation. In their Reply Comments, CEO took exception with Figure 10.3 from the June 2022 VODER Study (presenting an example of a typical home’s payback under a Net Energy Metering and Hourly Net Billing compensation structure), suggesting it compromises the objectivity of the VODER Study.⁶¹

The Company believes it was appropriate to include the other areas of study in this section, as the Commission-approved Study Framework directed the Company to include an explanation of how potential customer-generators “will have accurate and adequate data and information to make informed choices about the economics of on-site generation systems.”⁶² As pointed out by Staff in its Reply Comments, in Order No. 34509, the Commission unequivocally advised “stakeholders in the on-site generation industry [including the Company] to be completely transparent with potential investors that a utility’s rate schedule, including program fundamentals, is subject to change.”⁶³ The Company works diligently to provide information to its prospective on-site generation customers to keep them informed about the potential for modifications to the on-site

⁶⁰ Staff Initial Comments at 18.

⁶¹ CEO Reply Comments at 13.

⁶² IPC-E-21-21, Order No. 35284 at 27.

⁶³ Staff Reply Comments at 8 (citing Order No. 34509 at 13).

generation offering. Further, in past proceedings, parties have raised concerns that if the Commission were to adopt a net billing construct, solar installers may not have access to the information they need to make informed investment decisions. As such, the Company believes it is important for the Commission to understand the types of information that it makes available to its customers and the data that currently is and will be available, if it ultimately determines a modification to the on-site generation offering is warranted.

Based on the feedback from CEO, the October 2022 VODER Study excludes Figure 10.3 from the June 2022 VODER Study; however, the discussion about what information the company makes available to customers is still included.

IV. NEXT STEPS / PROCEDURAL RECOMMENDATIONS

Several parties ask the Commission to address next steps, including scoping of the implementation phase in its order either acknowledging or rejecting the October 2022 VODER Study. Specifically, Boise City asked the Commission to identify “clearly established next steps and a general framework for a schedule” and to “direct the Company to file a proposal for revisions” as part the order issued acknowledging the VODER Study.⁶⁴ ICL acknowledges “that the Commission has the authority to authorize modifications in this docket,” and subsequently asks “for clarity on the scope of such changes.”⁶⁵ CEO suggests that “in its next order in this docket, the Commission direct only the Company to file recommendations,” noting “all parties should then have opportunity to submit initial comments and all parties should have the opportunity to

⁶⁴ City of Boise Reply Comments at 4.

⁶⁵ ICL Reply Comments at 5.

reply.”⁶⁶ Similar to other comments, CEO points out “the public is unclear of what and when matters will be decided and when such decisions will be made effective.”⁶⁷

Parties also make recommendations for the Company to provide an additional notice, formally noticing customers of the transition into the implementation phase of this proceeding, along with making customers aware of the Company’s proposals related to modifying the on-site generation offering.⁶⁸

After careful consideration of the Parties’ procedural recommendations, the Company believes having the Commission issue an order directing further process would provide sufficient clarity as to appropriate next steps in the case. As such, Idaho Power respectfully requests the Commission consider including the following in its upcoming order in the matter upon acknowledgement or rejection of the October 2022 VODER Study:

- (1) Direct Idaho Power to file a proposal recommending modifications to the on-site generation offering by December 30, 2022, and;
- (2) Direct Staff to confer with the parties to align on a procedural schedule recommendation that can be presented to the Commission for their consideration as soon as practicable.

While some parties request the Commission specifically outline the scope of the changes to be considered, the Company believes the Commission’s previous orders have provided clarity on the scope of changes to be considered. Notably, in Order No. 35284

⁶⁶ CEO Reply Comments at 13-14.

⁶⁷ *Id.* at 14.

⁶⁸ City of Boise Reply Comments at 5 and ICL Reply Comments at 5.

that authorized the Study Framework, the Commission highlighted that the following items were within scope for the Study: Measurement Interval (pgs. 12-14), Export Credit Rate (pgs. 14-22 and 26-27), Recovering Export Credit Rate Expenditures (pgs. 22-23), Project Eligibility Cap (pg. 25), Implementation Issues, (pg. 27), Export Credit Rate Expiration (pg. 28), and Frequency of Export Credit Rate Updates (pg. 29).⁶⁹ The Company believes this list of issues would be reasonably included in an implementation proposal put forth by the Company.

The Commission already declined to include certain previously contemplated issues, such as Cost of Service and Rate Design (pgs. 23-25), Off-Site Exporting Facilities (pgs. 29-30), and other Additional Areas of Study (pgs. 30-32), within the scope of this proceeding.⁷⁰ While the Company believes the Commission's prior order was clear in what would be considered "in-scope" for near-term changes to the on-site generation offering, it respectfully requests the Commission clarify in its upcoming order if the Company's understanding is incorrect.

Finally, some comments suggest that there should be additional meetings and/or further opportunities for comment to discuss the Company's proposals prior to the Company filing its recommendations for implementation.⁷¹ The Company has been committed to utilizing a collaborative approach in developing and pursuing the study; public and party involvement has been robust and instrumental in this process. There is

⁶⁹ Case No. IPC-E-21-21, Order No. 35284.

⁷⁰ *Id.*

⁷¹ CEO Reply Comments at 13-14 (suggesting an "all-party" meeting for the Company to share and discuss its tentative recommendations) and ICL Reply Comments at 6 (requesting that parties be allowed to comment and organize meetings to review the Company's proposal before it is submitted to the Commission).

no need at this stage, however, for another round of comments and/or meetings in advance of the Company submitting its recommendation for potential modifications to its on-site generation offerings. The procedural schedule has provided ample opportunity for comment and participation during this phase of the docket . A robust record of public and party comments already exists that has been crucial in refining the VODER Study and will ultimately help inform the Company's proposal. There will also be further opportunities for participation via the three scheduled public hearings and the extended comment period.⁷²

While all-party discussions to resolve issues prior to Commission consideration can often be productive, efficient, and beneficial, the Company does not believe that approach is appropriate under the unique circumstances of this case. Rather, considering the regulatory background and the level of public interest, it is important to ensure an abundantly transparent process and that members of the public have equal opportunities to weigh in as the parties. Moreover, at the conclusion of the current phase of the docket the record will be more than sufficient for the Company to make a well-informed recommendation based on what it believes is in the best interest of all customers – those with and those without on-site generation – and for the Commission to meaningfully evaluate the proposal. Consequently, the Company does not believe additional meetings would be productive at this point in the proceeding and are not necessary to formulate the Company's implementation recommendation.

The Company agrees with parties that the public should be noticed of any proposed changes and intends to distribute bill inserts to all customers and issue a press release bringing the matter to the public's attention once it files its proposal of changes to

⁷² Order No. 35558.

the on-site customer generation service offering. Persons and parties will have another opportunity to participate during the study implementation phase.

V. PUBLIC INVOLVEMENT

As noted previously, this docket derives from a series of prior cases that started in 2017 when the Company launched its effort to have the Commission review and modify the outdated net metering offerings to better align with then-current circumstances.⁷³ A subsequent case attempted to resolve the matter through a settlement agreement reached through negotiations with Staff and various stakeholders, but the Commission ultimately ruled that process was insufficient under the circumstance not only due to the absence of the comprehensive study it previously ordered, but because it did not adequately engage the public. Given the intense public interest in the case and importance of the issues, the Commission made clear that public engagement was crucial in study design, study review, and beyond.⁷⁴

The Company, Commission Staff, and all other stakeholders to the case would do well to listen to and understand the public sentiment regarding the importance of distributed on-site generation to Idaho Power's customers. In Order No. 34046 we said, "The Company must continue to listen to and understand, and address its customers' concerns in these cases." Order No. 34046 at 25. **Given the quantity and tone of the public comments, it appears as if this has not yet happened.** We expect that a well-developed underlying record will provide a basis for any future changes. **A comprehensive and transparent analysis should allay many of the concerns expressed by customers.**⁷⁵

⁷³ Case No. IPC-E-17-13, Application (Jul. 27, 2017).

⁷⁴ Case No. IPC-E-18-15, Order No. 34509 at 6-10.

⁷⁵ *Id.* at 10 (emphasis added).

The Company received the message and has actively pursued public involvement as it worked to fulfil the Commission's mandates. Utilizing a collaborative approach, the Company sought input from the public and stakeholders in both designing and pursuing the VODER Study and now as it seeks to refine and clarify the VODER Study. As part of this process, the Company has held several public workshops aimed at listening to members of the public to ensure the Study was informed by customers and interested parties.⁷⁶ The Company has made its materials publicly available and has worked in earnest to provide clear, transparent, and factual information regarding the VODER Study to its customers.

As of October 25, 2022, 681 public comments have been received. The Company understands the great interest shown in this case and appreciates those members of the public that have chosen to participate, which represent roughly 0.1 percent of the Company's total customers. As Staff notes, approximately 1/3 of the comments were received from customers who acknowledge owning a solar system and being enrolled in NEM.⁷⁷

Several of the comments include information or recommendations related to implementation, which as discussed above will be more properly addressed in the next phase of this proceeding. Because the purpose of the VODER Study is to develop a range of potential methodologies that may serve as a basis to inform future implementation

⁷⁶ On October 20, 2021, the Company held a workshop as part of the development of the scope in Case No. IPC-E-21-21. On May 2, 2022, and in preparation of the study based on the scope established by the Commission in Order No. 35284 (December 30, 2021), the Company held a public workshop to solicit input on several elements associated with the ECR. On August 31, 2022, the Company held a public workshop presenting the VODER Study and providing the public with an opportunity to ask clarifying questions and provide comments.

⁷⁷ Staff Reply Comments at 8.

recommendations, the October 2022 VODER Study does not incorporate the various implementation recommendations or considerations.

As they relate to the VODER Study itself, many of the commenters may not be aware that it stems from a series of preceding cases that have laid the groundwork for the study process. In other words, many of the issues raised have already been addressed by the Commission. For example, when the Commission set the Study Framework in Case No. IPC-E-21-21, it explicitly considered whether a “third-party” should conduct the study, ultimately rejecting that course of action:

The Commission finds that the Company is best positioned to access and study the extensive data and issues specific to the Idaho Power system at a reasonable cost. We understand the argument that third-party evaluators have a different perspective and the results may be believed to be more credible by some customers. However, **third-party studies may be more generic and not fully reflect the environmental requirements in Idaho or the peculiarities and/or particulars of the Company’s system.** Studies conducted in other states provide insight but are not determinative of what is most reasonable for Idaho Power’s customers. **The Company is directed to provide sufficient data along with the study conclusions so that others have insight as to how the results were derived.**⁷⁸

In a similar vein, some of the comments appear to overlook the role that party and public feedback have already played in shaping the VODER Study to this point. For example, following the Commission’s approval of the final Study Framework,⁷⁹ the Company voluntarily and proactively solicited feedback from parties and the public while

⁷⁸ Order No. 35284 at 11.

⁷⁹ Case No. IPC-E-21-21, Order No. 35284.

the VODER Study was under development through a public workshop.⁸⁰ The workshop, which was attended by several parties that participated in prior on-site customer generation cases and more than 40 members of the public, presented an overview of the methodologies identified within the Study Framework and asked for public feedback regarding the methods under study for determining the value of excess net energy.⁸¹ The Company received questions during the workshop and invited written comments following the workshop as well. Only five public comments were received, along with comments from a single intervening party – CEO.⁸² No other comments were submitted including from other parties to this case. As such, the Company developed the June 2022 VODER Study consistent with the specific methods the Commission previously directed should be reasonably considered. Notwithstanding, the Company has worked in earnest to incorporate new methods presented by the parties in their Initial and Reply Comments (e.g., the PCAF capacity method) that were not previously requested to be included.

A number of public comments express a general distrust of the VODER Study and the conclusions reached and call for adoption of the Crossborder Review as the basis for any modifications to the Company's on-site generation offering. As the Company explained in its Reply Comments, Idaho Power routinely conducts complex studies to inform Commission decisions in ratemaking matters such as this and has a vested interest in ensuring the information it puts forth is fair, credible, and unbiased, unlike a privately retained consultant. Moreover, the Crossborder Review is flawed in several

⁸⁰ See Direct Testimony of Grant Anderson, Exhibit 1 for the press release for the workshop.

⁸¹ See Direct Testimony of Grant Anderson, Exhibit 2 for the presentation.

⁸² See Application at 11-14 and Direct Testimony of Grant Anderson at 32-36 and Exhibit 3 for more details on the workshop, comments received, and how they were addressed.

respects and includes assumptions and methodologies inconsistent with Idaho regulatory precedent and incongruous with the Commission-approved Study Framework.⁸³

Idaho Power understands that several commenters ardently support on-site generation, and many conflate changes to the net-metering service offering as intended to discourage customer self-generation. A number of commenters raise concerns related to how they may be impacted by changes to the program, seek the continuation of retail rate net metering (for both existing and new customers), and/or call for expanded legacy treatment for those customer systems that were not previously granted legacy treatment under prior Commission orders. Many of the comments express a desire for the Commission to implement policies and frameworks that will encourage the adoption of distributed generation through subsidization in customer rates in the Company's service area.

The Company earnestly supports customer choice in clean energy sources and wants to make sure that on-site customer generation can continue to play a role in its energy portfolio by ensuring that rates paid for excess generation are fair and equitable to both generating and non-generating customers.⁸⁴ While elevating the short-term financial interests of some stakeholders above the long-term interests of all customers might provide immediate gratification for some, Idaho Power is concerned this approach

⁸³ See also IIPA Reply Comments at 4 (stating the analytic choices in the Crossborder Review "are not reasonable and should not be adopted. . . The Commission should disregard all aspects of the Crossborder study.")

⁸⁴ See also IIPA Reply Comments at 2 ("[D]istributed energy, when properly priced and tariffed, can play an important role in the IPC's energy portfolio. But this role should be the outcome of economically supportable analysis, and not the outcome of a general policy goal to increase distributed generation for its own sake.")

is not economically supportable and would ultimately harm the long-term viability of solar energy. Instead, a more meaningful approach focused on increased reliability, efficiency, and economic viability should be pursued to help ensure on-site generation continues to thrive.

VI. CONCLUSION

This docket represents another incremental step towards fulfilling the Commission's ultimate objective: "The Company's future net-metering programs will be based on a credible and fair study, developed with public input, and will reasonably balance the interests of customers with net metering, and customers without net metering."⁸⁵

The VODER Study examines several methods of valuing customer-owned generation energy exports and explores other important considerations that will ultimately help inform the Commission as it considers programmatic changes. The VODER Study was developed and pursued using a collaborative approach that has continued in the study review process. Specifically, the input provided by the parties and public has identified areas of the VODER Study that could benefit from further clarification and refinement, which have been incorporated into the October 2022 VODER Study. While not substantively modifying the initial study, Idaho Power believes the information incorporated into the October 2022 VODER Study that accompanies these Final Comments provides a solid foundation on which modifications to its on-site customer generation offerings can be proposed for the Commission's consideration in the next phase of this docket.

⁸⁵ Case No. IPC-E-18-15, Order 34509 at 15.

Idaho Power respectfully requests the Commission issue an order (1) finding the October 2022 VODER Study satisfies the study directives outlined in Order Nos. 34046, 34509, and 35284; (2) directing Idaho Power to file a proposal recommending modifications to the on-site generation offering by December 30, 2022; and (3) directing Staff to confer with the parties to align on a procedural schedule recommendation that can be presented to the Commission for their consideration.

DATED at Boise, Idaho, this 26th day of October 2022.



MEGAN GOICOECHEA ALLEN
Attorney for Idaho Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 26th day of October 2022, I served a true and correct copy of Idaho Power Company's Final Comments upon the following named parties by the method indicated below, and addressed to the following:

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Stacy Gust

Stacy Gust, Regulatory Administrative Assistant

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION
CASE NO. IPC-E-22-22**

IDAHO POWER COMPANY

ATTACHMENT 1

**OCTOBER 2022 VALUE ON-SITE DISTRIBUTED
ENERGY RESOURCES (VODER) STUDY
(CLEAN VERSION)**

SEE ATTACHED SEPARATE DOCUMENTS

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION
CASE NO. IPC-E-22-22**

IDAHO POWER COMPANY

ATTACHMENT 2

**OCTOBER 2022 VALUE ON-SITE DISTRIBUTED
ENERGY RESOURCES (VODER) STUDY
(LEGISLATIVE VERSION)**

SEE ATTACHED SEPARATE DOCUMENTS