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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-23-06
Thain Cashmore vs. Idaho Power Company

Dear Ms. Noriyuki:

Enclosed for electronic filing please find Idaho Power Company's Answer in the above matter.

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

Sincerely,



Megan Goicoechea Allen

MGA:sg

Enclosures

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Attorneys for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

THAIN CASHMORE,)	
)	Case No. IPC-E-23-06
Complainants,)	
)	IDAHO POWER COMPANY'S
vs.)	ANSWER
)	
IDAHO POWER COMPANY,)	
)	
Respondent.)	
_____)	

COMES NOW, Idaho Power Company (“Respondent”, “Idaho Power” or “Company”), and pursuant to Procedural Rule 57, now answers the Summons of the Idaho Public Utilities Commission (“Commission”) dated March 8, 2023, concerning the formal Complaint (“Complaint”) of Thain and Cathy Cashmore (“Complainants” or “Cashmores”).

The Complainants seek review of, and relief from, Idaho Power’s application of the criteria established by the Commission for legacy status, or grandfathering, for residential customers with on-site generation. For the reasons set forth herein, Idaho Power

respectfully requests the Commission issue an Order denying the Complainants' requested relief. The Company correctly determined that the Complainants' solar expansion was not eligible for legacy status because they did not satisfy the requirements established by the Commission. Idaho Power has applied the criteria established by Commission Order and does not believe a Commission-authorized exception is warranted based on the facts of this case.

I. REQUIREMENTS TO PERFECT LEGACY STATUS

1. Idaho Power customers who install on-site generation can interconnect an exporting system under the terms of Schedule 6, Residential Service On-Site Generation ("Schedule 6"), Schedule 8, Small General Service On-Site Generation ("Schedule 8"), or Schedule 84, which is the tariff schedule for the Company's commercial, industrial, and irrigation ("C&I") customers to take net metering service.

2. The Commission previously found that when a customer-generator made a significant investment in an on-site system based on reasonable reliance of program stability, it was fair, just, and reasonable, non-discriminatory, and in the public interest to allow them to recoup the value of their investments over the anticipated life of their investments.¹

3. In a line of cases starting with Case No. IPC-18-15, the Commission began to establish parameters for distinguishing between existing and new customers based on the customers' reasonable expectations when making significant personal investments in on-site generation systems.² In Order No. 34509 issued on December 20, 2019, the Commission stated that, prior to that date, customers could have reasonably believed

¹ *In the Matter of the Petition 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 10 (Dec. 20, 2019).

² *Id.*

that net-metering program fundamentals would remain the same and made decisions to invest in on-site generation systems in reliance on that belief. With that pronouncement, however, the Commission established a firm cut-off for the reasonableness of this assumption: “After the issuance of this Order. . . we believe it will no longer be reasonable for a customer to assume the net-metering program fundamentals will remain the same over the expected payback period of their investment.”³

Specifics of Legacy Status

4. Finding reasonable differences between existing and new net-metering customers based on the uncertainty that may have existed prior to the issuance of Order No. 34509, the Commission “grandfathered” existing net-metering customers into Schedule 6 or Schedule 8 as those schedules existed on the service date of Order No. 34509. The Commission defined an “existing” customer eligible for grandfathered or legacy status under Schedule 6 and Schedule 8 as:

...a person or business who either has an on-site generation system interconnected with Idaho Power’s system as of the service date of this Order, or who has made binding financial commitments to install an on-site generation system as of the service date of this Order **and who proceeds to interconnect their system within one year of the service date of this Order [December 20, 2019].**⁴

5. The financial commitment required for legacy status could be an obligation to a third-party installer or supplier. Additionally, if a person or business had made a financial commitment as of December 20, 2019, but had not yet applied to Idaho Power, that person or business was directed to apply to Idaho Power within thirty days of the

³ *Id.*

⁴ *Id.* at 14 (emphasis added).

Order, including receipts demonstrating that a financial commitment was made on or before December 20, 2019.⁵

6. The Commission found it reasonable and just to provide legacy or “grandfathered” status to the system, under the following criteria:

- A customer who moves into a property with a grandfathered net-metering system gets to “inherit” the grandfathered status of the system;
- If a system is offline for more than six months, or is moved to another site, the grandfathered status of the system is forfeited;
- To allow for the replacement of degraded or broken panels, the customer may increase the capacity of the grandfathered system by no more than 10% of the originally installed nameplate capacity, or 1 kW, whichever is greater; and
- Grandfathered status terminates December 20, 2045.⁶

7. The Commission also clarified that if a customer with a legacy system wants to add generating capacity, it can do so without losing legacy status for the entire system if the output for the system expansion can be metered separately.⁷

Customer Generation Interconnection

8. Schedule 68, Interconnections to Customer Distributed Energy Resources (“Schedule 68”), sets forth the process for new customer generator systems and system expansions to interconnect with the Company’s system, which starts with the customer’s application and concludes with the successful completion of the Company’s on-site inspection.⁸

9. Idaho Power’s standard business practice is to coordinate certain aspects of the application process directly with the customer’s installer as identified on the

⁵ *Id.*

⁶ *Id.*, Order No. 34546 at 9 (Feb. 5, 2020).

⁷ *Id.* at 11.

⁸ Schedule 68, Interconnections to Customer Distributed Energy Resources, Sheet No. 68-12.

customer generation application, as the installer is generally more familiar with the application process. It is also typical for an installer to complete the necessary permitting and inspection requirements for the project and to submit the System Verification Form on behalf of the customer.

10. Upon receipt of an Approval to Proceed from Idaho Power, the customer/installer is responsible for completing the system's installation and fulfilling all applicable federal, state, and local inspection requirements.⁹ In addition, after installation and following successful completion of a state or city electrical inspection, the customer/installer must provide Idaho Power with a completed System Verification Form detailing the specifications of all installed components of the completed system.¹⁰

11. Once all required documentation has been submitted, and the Company has verified that all applicable federal, state, and local requirements have been met, the Company will complete, barring conditions beyond the Company's control, an on-site inspection within ten (10) business days for a system with a total nameplate capacity of 100 kilovolt-ampere ("kVA") or less.¹¹

12. Successful completion of Idaho Power's on-site inspection constitutes the conclusion of the application process. The customer will receive confirmation that the application process has been completed.¹²

Perfection of Legacy Status

13. As of December 20, 2019, there were approximately 590 applications potentially eligible for legacy status under Schedules 6 and 8 if proof of financial

⁹ Schedule 68, Interconnections to Customer Distributed Energy Resources Sheet No. 68-11.

¹⁰ *Id.*

¹¹ Schedule 68, Interconnections to Customer Distributed Energy Resources Sheet No. 68-12.

¹² *Id.*

commitment was provided and the interconnection process was completed by December 20, 2020.

14. As of December 20, 2020, approximately 430 of the 590 systems completed the interconnection process and perfected legacy status.

15. As of December 20, 2020, approximately 160 of the 590 systems did not perfect legacy status. These systems did not perfect legacy status for a variety of reasons: inability to provide proof of financial commitment; lack of response after submitting the customer generation application; election to not move forward with a particular project; and/or inability to complete the interconnection process prior to the December 20, 2020 deadline. Some of these customers may experience inequitable treatment if the Commission were to grant the relief requested by the Cashmores in this Complaint.¹³

II. FACTUAL BACKGROUND

Existing System and Application for System Expansion

16. Since 2016, the Complainants have taken net metering service under the Company's Commission-approved tariff schedule¹⁴ at 5169 West Yarrow Road in Pocatello, Idaho. The original system at that location, a 28 panel, 7.98 kW solar photovoltaic ("PV") system, came online in June of 2016.

17. Idaho Power received a Customer Generation Application from the Complainants on May 6, 2019, in which they requested approval to expand their solar PV system through installation of 10 additional panels rated at 3.0 kW (Attachment 1). The

¹³ See, e.g., *In the Matter of Randy Valley's Formal Complaint Against Idaho Power Company Concerning Grandfathering of Ten Solar Panels*, Case No. IPC-E-21-34, Order No. 35253 at 6 (Dec. 9, 2021) (finding the Company appropriately enforced the Commission's grandfathering requirements in finding the complainant's expanded system ineligible for legacy status based on his failure to complete the interconnection process by December 20, 2020).

¹⁴ Pursuant to Order 34046 in Case No. IPC-E-17-13, as of June 1, 2018, residential customers with on-site generation were moved from Schedule 84 to newly created Schedule 6.

customer listed CR Solar Installations (“CR Solar” or “Installer”) as the project contact on the application and authorized Idaho Power to discuss the project with it.

18. Idaho Power sent the Complainants and CR Solar an Approval to Proceed email on May 7, 2019 (Attachment 2), advising that the application for the 10-panel system expansion had been approved and describing the next steps necessary to complete interconnection including the following responsibilities of the customer and Installer:

- Install the renewable generation system
- Pass the state/city electrical inspection
- Submit a System Verification Form to Idaho Power

The Approval to Proceed email also explained the application approval was good for one year, cautioning that the application would expire if the interconnection of the system expansion was not completed within one year, by May 6, 2020.¹⁵

19. Subsequently, on December 20, 2019, the Commission issued its Order delineating the parameters of legacy status, “grandfathering” existing customers into Schedule 6 or Schedule 8 as those Schedules existed on December 20, 2019.¹⁶ Existing customers included those with on-site generation systems interconnected as of that date as well as those that had made a binding financial commitment to install an on-site generation system as of December 20, 2019, and that proceeded to interconnect within one year (or by December 20, 2020).¹⁷

¹⁵ Schedule 68, Interconnections to Customer Distributed Energy Resources Sheet No. 68-8 states: *Applications that are not completed within one year of the initial Feasibility Review are considered expired. Customers requesting connection or approval of expired applications are required to resubmit a completed application form and \$100 application fee and are subject to the full application process described in Section 2.*

¹⁶ Order No. 34509 at 14.

¹⁷ *Id.*

20. Idaho Power provided solar installers, including CR Solar, notice of Commission Order No. 34509 on January 6, 2020 via email (Attachment 3 at 4-5).¹⁸

21. On January 7, 2020, Idaho Power called Complainants to discuss the requirements outlined in the Commission's Order and notified them that for the system expansion to be eligible for legacy status, they would need to submit proof they had made a binding financial commitment prior to December 20, 2019, and complete interconnection of the system by December 20, 2020.

22. In addition to the telephone discussion with Complainants on January 7th, Idaho Power sent a follow-up email to the Cashmores on January 9, 2020, outlining the requirements for legacy status eligibility, including the necessity of providing proof that they had made a binding financial commitment by December 20, 2019, and the need to finish the interconnection process a year from that date in order to be grandfathered (Attachment 4).

23. Idaho Power sent another written notification on January 14, 2020, via email to customers with pending Customer Generator Applications, including Complainants, advising of the Commission's Order in Case No. IPC-E-18-15 and again outlining the requirements for legacy status eligibility, including the necessity of providing proof that they had made a binding financial commitment by December 20, 2019, and the need to finish the interconnection process a year from that date in order to be grandfathered (Attachment 5).

24. On January 15, 2020, Idaho Power replied to an email from Complainants providing examples of the types of documentation that would constitute proof of financial

¹⁸ The email from Idaho Power to solar installers was originally sent on Friday, January 3, 2020, but resent on January 6th with updated hyperlinks.

commitment (Attachment 6 at 2-3). Subsequently, on January 20, 2020, the Cashmores submitted documentation from Installer demonstrating they had made a binding financial commitment relative to the expanded system, receipt of which was confirmed by Idaho Power in an email dated January 21, 2020 (Attachment 6 at 1-2).

25. On January 31, 2020, Idaho Power sent email confirmation to a number of customers, including Complainants, advising that it had timely received documentation showing a financial commitment for their systems was made prior to December 20, 2019 (Attachment 7). The email further explained that in order to be eligible for grandfathering per the Commission's order, the systems "must also be installed and interconnected by December 20, 2020," and provided a link where the customer could access the technical requirements and application process on Idaho Power's website.

Follow-Up Interconnection Communications

26. In the ensuing months, Idaho Power endeavored to follow the progress of the Cashmores' system expansion, attempting contact with Complainants and/or their Installer on multiple occasions between May 2020 and December 2020. More specifically, on May 15, 2020, Idaho Power sent an email to Installer requesting a status update (Attachment 8); it did not receive a response.

27. On October 20, 2020, Idaho Power left phone messages for both Complainants and Installer, and on that same day, also sent them an email (Attachment 9), which stated, in pertinent part:

In May 2019, we received an application to add an additional 10 panels (3 kW). We also received proof that a financial commitment was made for this expansion prior to December 20, 2019. Under a PUC order, if the expansion is complete by December 20, 2020, it will qualify for grandfathering too. If not, the expansion must be metered separately to preserve the grandfathered status of your original system.

28. Complainants responded to Idaho Power's email on October 20, 2020, by confirming that the additional panels had been installed (Attachment 10).

29. Having not yet received the System Verification Form, Idaho Power made several attempts to call Installer, leaving phone messages on November 10th, November 13th, and November 18th. CR Solar did not respond to any of these messages.

30. On November 30, 2020, Idaho Power sent another email to the Cashmores and Installer advising them again that the interconnection process for the system expansion was incomplete and providing instructions on how to finish the process. The Company also provided another reminder of the looming deadline: **"If the expansion interconnection process is complete by December 20, 2020, it too will qualify for grandfathering. If it is not completed, the entire system could lose grandfathering status."** (Attachment 10 (emphasis in original)). Idaho Power did not receive further communication from Complainants or Installer prior to the December 20, 2020, deadline.

31. Figure 1 provides a summary of all communications from Idaho Power to the Complainant and/or Installer from the time it provided notice that the application for system expansion had been approved (May 7, 2019) until the deadline to complete the interconnection process for legacy status (December 20, 2020).

Figure1

Idaho Power Communication and Outreach Log May 7, 2019 – December 20, 2020					
Date	Type	Topic	Attachment	Communications with: Complainants	CR Solar
05/07/2019	Email	Approval to Proceed Re: Customer Generator Application	Attachment 2	✓	✓
01/06/2020	Email	IPUC Order Re: Legacy Status	Attachment 3		✓
01/07/2020	Phone	Financial Commitment & IPUC Order Re: Legacy Status	N/A	✓	
01/09/2020	Email	IPUC Order Re: Legacy Status	Attachment 4	✓	
01/14/2020	Email	IPUC Order Re: Legacy Status	Attachment 5	✓	
01/15/2020	Email	Proof of Financial Commitment	Attachment 6	✓	
01/21/2020	Email	Reply Re: Financial Commitment	Attachment 6	✓	
01/31/2021	Email	Receipt of Proof of Financial Commitment	Attachment 7	✓	
05/15/2020	Email	System Expansion Status	Attachment 8		✓
10/20/2020	Phone Message	System Expansion Legacy Status	N/A	✓	✓
10/20/2020	Email	System Expansion Legacy Status	Attachment 9	✓	✓
11/10/2020	Phone Message	System Verification Form	N/A		✓
11/13/2020	Phone Message	System Verification Form	N/A		✓
11/18/2020	Phone Message	System Verification Form	N/A		✓
11/30/2020	Email	Additional Action Needed System Verification	Attachment 10	✓	✓

32. Despite Idaho Power's diligent and repeated efforts to ensure the Cashmores completed the interconnection process before the December 20, 2020 grandfathering deadline passed, they did not do so. As a result, on December 22, 2020, Idaho Power sent an email to the Cashmores and Installer advising them that the May 6, 2019, application for the system expansion had expired due to their failure to timely complete the interconnection process (Attachment 11).

33. Subsequently, on December 30, 2020, CR Solar emailed the System Verification Form to Idaho Power, which indicated that the final electrical inspection had

occurred on December 29, 2020¹⁹ (Attachments 12 and 13). Idaho Power responded to Installer the same day indicating that the project application had expired and resending its December 22, 2020 email advising of the same (Attachment 14).

34. On January 6, 2021, Idaho Power spoke with CR Solar via telephone explaining the requirement to separately meter the output of the system expansion or lose legacy status and discussing the Company's repeated efforts to communicate with Installer and Complainants about the December 20, 2020 deadline. On January 7, 2021, Idaho Power left a phone message for Complainants and also followed up with an email to them and Installer that same day outlining the next steps (Attachment 3). More specifically, Idaho Power explained that the Complainants could retain legacy status of the existing system by having the 10-panel expansion separately metered, which would require a new application and fee for the 10-panel expansion. As an alternative, Idaho Power indicated that the expansion could be installed with the existing system, but that legacy status would be forfeited (Attachment 3).

35. Idaho Power had another phone conversation with Complainants on January 21, 2021, in which it again explained the requirements for legacy treatment delineated by the Commission, reviewed the Company's many efforts to communicate the deadlines with both Complainants and Installer, and the options moving forward.

2021 Informal Complaint

36. Complainants submitted an informal complaint to the Commission on January 21, 2021, regarding the loss of legacy treatment based on the system expansion. On or about January 22, 2021, Complainants submitted a Customer Generator

¹⁹ But see ¶53, below, and Attachment 18 (permit records) indicating the final inspection was not completed until January 22, 2021.

Application to Idaho Power to separately meter the additional panels to retain legacy status of the original system (Attachment 15). In responding to the Commission Staff investigators' inquiries regarding the informal complaint on January 29, 2021, Idaho Power described the sequence of events and noted that the customer had recently requested to have the expansion separately metered.

37. Subsequently, on May 26, 2021, Complainants sent an email to Idaho Power advising that the 10 additional solar panels installed had "been isolated" to power the backup battery system exclusively (Attachment 16). As a result, they indicated: "This should resolve our appeal filed with the PUC and eliminate the need for a net meter on the 2019 addition." In response, Idaho Power asked Complainants to verify that they wished to withdraw their January 2021 application to separately meter the panels, which they confirmed (Attachment 16).

Legacy System Limit Exceeded

38. In January of 2023, a reverse rotation report run by Idaho Power signaled that exports from the Cashmores' solar PV system exceeded the approved size of that system (7.98 kW) for the months of April, May, and June of 2022, which indicated an unauthorized expansion of the system. As a result, Idaho Power sent correspondence to Complainants on January 24, 2023, notifying the Cashmores of their system's exceedance, and advising them of the steps they needed to take to resolve the issue. (Attachment 17). On January 26, 2023, Idaho Power also called and spoke with the Cashmores about the situation. The Complainants verbally confirmed that the expansion had been installed and was operational.

2023 Complaint

39. The Cashmores then submitted another complaint to the Commission on or about February 9, 2023, and the Commission issued a Summons and Formal Complaint against Idaho Power on March 8, 2023, in Case No. IPC-E-23-06. In their Complaint, the Cashmores claim that their failure to complete the interconnection process for the system expansion prior to the deadline to retain legacy status was due to the electrical inspector delaying the final electrical inspection. As a result, they are requesting the Commission grant legacy status to their entire system, including the system expansion. Notably, the 2023 Complaint was the first time the Company learned that Complainants were attributing the failure to timely interconnect to the electrical inspector.

III. ANSWER

40. Idaho Power denies any allegation not specifically admitted and reserves the right to supplement and/or amend its Answer if the Cashmores amend their Complaint, respond to discovery requests, or if additional defenses are ascertained during the course of discovery or otherwise.

A. Idaho Power Lacks Authority to Deviate from the Requirements for Legacy Treatment Established by the Commission or from the On-Site Generation Interconnection Rules Set forth in the Company's Tariff.

41. Neither the Idaho Legislature nor the Commission has authorized the Company to exercise discretion that deviates from prior Commission's orders or the Commission-approved tariff.

42. Idaho Power is required to follow the Commission's prior orders as well as the utility tariff on file with the Commission. This concept, known as the "filed rate

doctrine,” is a basic principle of utility regulation that states that a utility may charge only the approved rates and charges it has on file with its regulatory body.

43. Together, *Idaho Code* §§ 61-313 and 61-315 codify the concepts that make up the filed rate doctrine for the State of Idaho. *Idaho Code* § 61-313 provides, in pertinent part, that no refund or remit of any rates or charges may be made, and *no contract or agreement extended except as specified by tariff and as are regularly and uniformly extended to all corporations or persons*. Similarly, *Idaho Code* § 61-315 codifies the concept of non-discriminatory service and prohibits a utility from giving preferential treatment to any customer or customer class over another.

44. A customer’s request to receive treatment that deviates from the tariff and/or Commission precedent, such as the Cashmores’ request to deviate from the Commission established requirements to maintain legacy status, implicates the “filed rate doctrine” and authorizing such would defeat this non-discriminatory policy. The Company could not excuse Complainants’ non-compliance with the Commission’s requirements for granting legacy status as doing so would violate the Commission’s directive establishing December 20, 2020 as the deadline for completing the system interconnection to be eligible for legacy status.²⁰ In other words, regulatory compliance is an affirmative defense to the Complaint.

B. The Company Correctly Applied the Requirements of Order Nos. 34509 and 34546 and the Company’s Tariff.

45. Contrary to the requirements of Rule of Procedure 54.03, the Complainants did not refer to specific provisions of statute, rule, order, notice, tariff, or other controlling

²⁰ Order Nos. 34509 and 34546.

law that the utility has violated.²¹

46. Idaho Power affirmatively defends that it followed the Commissions' directives in Order Nos. 34509 and 34546 and correctly applied and enforced the requirements for legacy treatment relative to the Cashmores' system expansion as established by the Commission. Idaho Power has consistently applied these criteria for all eligible customers.²²

47. Having failed to meet the requirements for legacy status for their solar system expansion, Idaho Power appropriately provided Complainants with the following options pursuant to Commission's Order No. 34546: (1) Separately meter the 10-panel expansion and retain the legacy status of the existing system; or (2) Forfeit grandfather status of the entire system and complete interconnection of the expansion behind the existing meter.²³

48. In addition, after becoming aware of the Cashmores' unauthorized installation in 2023, Idaho Power provided them the following two options pursuant to Schedule 68: disconnect immediately and complete the full interconnection process after which the system could be reenergized or permanently disable the installation from parallel operations with the Company's system. Idaho Power is required by law to follow the rules of on-site generation interconnection set forth in Schedule 68, including treating system modifications that have not completed the interconnection process as unauthorized installations subject to immediate disconnection until the situation is resolved. The tariff is unequivocal, and the Company followed it as written.

²¹ IDAPA 31.01.01.054.03.

²² See, e.g., *In the Matter of Randy Valley's Formal Complaint Against Idaho Power Company Concerning Grandfathering of Ten Solar Panels*, Case No. IPC-E-21-34.

²³ Order No. 34546 at 11.

C. Extension of the Grandfather Period for the Cashmores' Expanded Solar Array Would be Inexpedient and Inequitable.

49. The Complainants have requested that their whole system, including the 10-panels added in 2019, be granted grandfather status.

50. The Cashmores had over a year and a half (from May 2019 to December 2020) to complete the interconnection process for the expansion, in order for both the existing system and the 10-panel expansion to receive legacy status. They did not do so despite Idaho Power's repeated efforts to facilitate compliance.

51. Based on their failure to complete the interconnection process for their 10-panel expansion prior to the December 20, 2020 cutoff, the Complainants were advised that they could still retain grandfathering status of their original system by separately metering the output of the expansion. Though the Complainants originally indicated they would separately meter the output of the 10 additional panels, they later indicated that the expansion they installed had been reconfigured as an off-grid system (one that does not operate in parallel with the Company's system and is therefore not subject to the requirements of Schedule 68).²⁴

52. Recently, Idaho Power discovered that Complainants' on-site generation system exports exceeded the approved capacity, indicating that the additional panels had ultimately been connected to the original system (and interconnected to operate in parallel with Idaho Power's system) despite not having completed the interconnection process mandated by Schedule 68. In a January 2023 phone call with Idaho Power, Complainants verbally confirmed that the system expansion was interconnected and operational.

²⁴ Schedule 68 applies to customer generators owning or operating distributed energy resources "in Parallel with the Company's system." Schedule 68, Interconnections to Customer Distributed Energy Resources Sheet No. 68-1.

53. After Complainants missed the deadline for legacy treatment of the system expansion in December 2020, Idaho Power made clear that they would need to add a separate meter for the 10 additional panels if they wanted to retain legacy status for the original system.²⁵ After originally pursuing this option, Complainants subsequently advised Idaho Power that they did not want to move forward with installing another meter and withdrew their January 2021 Customer Generator Application to separately meter the additional panels.²⁶ Their subsequent installation of the additional panels behind the existing net meter connected in parallel with the Company's system was done despite having been advised that this was not an option if they wanted to retain legacy status for the original system.²⁷

54. Following Idaho Power's notice to Complainants advising of their on-site generation system's non-compliance (Attachment 17), Complainants filed their Complaint with the Commission arguing that their system expansion should be granted legacy treatment despite not having completed the interconnection process by the December 20, 2020 deadline, attributing their failure to do so to delays caused by the electrical inspector. To raise this as an issue at this time seems disingenuous in light of the timeline of events and course of communications relative to the system expansion set forth in Section II, above, and further, considering the discrepancies between the narrative in the Complaint compared with the permit records.

²⁵ This was communicated to Complainants by Idaho Power both verbally and in writing in January 2021, including in response to their 2021 informal complaint. See ¶¶ 33-37, above.

²⁶ See Attachment 15 (Cashmores' January 2021 Customer Generation Application) and Attachment 16 (May-June 2021 email correspondence between Complainants and Idaho Power).

²⁷ This was confirmed in a January 7, 2021 email from Idaho Power to Complainants and Installer, which indicated that keeping the expansion with the original system would forfeit grandfathering for the entire system; in a separate email to Installer Cashmore acknowledged: "Sounds like we don't have a choice but to meter the two systems separately." See Attachment 3 at 2-4.

55. While Idaho Power was not privy to the interaction or communication between the Cashmores, Installer, and the electrical inspector for the Idaho Division of Building Safety (“DBS”), the records publicly available on the Idaho DBS online database regarding the electrical permit for the Cashmores’ solar system expansion, Permit Number WEB2010-05164,²⁸ suggest a different sequence of events than those set forth by Complainants. For example, the Complaint states that the request for an inspection was originally made in April/May 2020, but the DBS Permit records indicate that the original electrical permit plan was not submitted until October 29, 2020, and because the documentation submitted at that time was determined by the examiner to be insufficient, it was required to be resubmitted. The material was then resubmitted on November 12, 2020, but found again to be deficient, resulting in another resubmittal on November 30, 2020, that also failed to fully address the issues. Finally, on December 14, 2020, plans were submitted that were approved with conditions on December 23, 2020. In addition, while the Complaint indicates the final electrical inspection occurred on December 29, 2020, the DBS Permit records list it as occurring on January 22, 2021.

56. Further, an extension of the Cashmores’ legacy status would be prejudicial to other customers with systems that lost legacy status due to similar circumstances. Since the Commission set the criteria for systems to retain grandfather/legacy status, a number of systems have failed to satisfy one or more of these requirements and lost legacy status as a result. It would be inequitable to other customers who did not timely perfect their claim to legacy status to give the Complainants additional time beyond that

²⁸ Permit Search available here https://web.dbs.idaho.gov/etrakit3/Custom/Idaho_PermitSearch.aspx. For ease of reference, copies and screenshots of pertinent permit materials obtained from the DBS Permit Search are included as Attachment 18.

set by Order No. 34509.²⁹ Idaho Power interprets *Idaho Code* § 61-315 as prohibiting the preference that would result if *more time* were given for the Complainants to receive legacy status for the requested 10-panel expansion.

IV. COMMUNICATIONS AND SERVICE OF PLEADINGS

57. Service of pleadings and communications with reference to this case should be sent to the following:

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V. CONCLUSION

58. As illustrated in this Answer, the Company appropriately enforced the requirements for grandfathering articulated by the Commission and is constrained under Idaho law from taking action that is different than that currently permitted by Commission's orders and the Company's Commission-approved tariff. Complainants failed to meet the requirements for legacy status for their solar expansion despite the Company's repeated efforts to facilitate their compliance, and it would be inexpedient and inequitable to grant Complainants additional time to perfect legacy status on its system expansion.

²⁹ See *In Re Complaint of Randy Valley*, Case No. IPC-E-21-34, Order No. 35253 at 6 (on a similar fact pattern, the Commission found that complainant failed to meet the requirements for legacy status, despite repeated attempts by the Company to assist him with compliance and found there was no reasonable basis to deviate from the requirements of Order Nos. 34509 and 34546).

59. Although the Complaint fails to state a claim against Idaho Power upon which relief can be granted in this forum, this does not preclude Complainants from enforcing legal rights, if any, they may have against their installer or others.

WHEREFORE, Idaho Power respectfully requests the Commission issue its Order denying the relief sought by the Complainants.

DATED at Boise, Idaho, this 29th day of March 2023.

A handwritten signature in black ink that reads "Megan Goicoechea Allen". The signature is written in a cursive, flowing style.

MEGAN GOICOECHEA ALLEN
Attorney for Idaho Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 29th day of March 2023, I served a true and correct copy of Idaho Power Company's Answer upon the following named parties by the method indicated below, and addressed to the following:

Commission Staff

Riley Newton
Deputy Attorney General
Idaho Public Utilities Commission
11331 W. Chinden Blvd., Bldg No. 8,
Suite 201-A (83714)
PO Box 83720
Boise, ID 83720-0074

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 FTP Site
 Email: Riley.Newton@puc.idaho.gov

Thain and Cathy Cashmore

5169 West Yarrow Road
Pocatello, Idaho 83201

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 FTP Site
 Email: cathy.cashmore@gmail.com

Stacy Gust

Stacy Gust, Regulatory Administrative
Assistant

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION
CASE NO. IPC-E-23-06**

IDAHO POWER COMPANY

ATTACHMENT 1

Customer Generation Application

Revised 5/16/19



Maximum Size: 25 kW Residential, Small General/100 kW Large Commercial, Industrial, Irrigation

This application is an interconnection request for existing accounts who wish to install renewable generation systems (solar, wind, hydro, biomass and fuel cell technologies) with the States of Idaho or Oregon. All generation systems must satisfy the requirements in Schedule 72, Interconnections to Non-Utility Generation. Upon completion of the interconnection process, customers will take service under one of the following schedules:

- Idaho Residential customers - Schedule 6, Residential Service On-Site Generation
- Idaho Small General Service customers - Schedule 8, Small General Service On-Site Generation
- All Oregon customers, and Idaho Large Commercial, Irrigation and Industrial customers - Schedule 84, Customer Energy Production/Net Metering Service

Upon receipt of the application and fee, Idaho Power will review the project and determine if any upgrades to the electrical grid are needed. If no upgrades are needed, customer will receive an approval to proceed. Application and fee expire one year after approval to proceed. Visit <http://www.idahopower.com/CustomerGeneration> for detailed information about the interconnection process, tariff schedules, production credits and credit transfer eligibility.

1. Project Information *Required Fields

Account Holder*	<u>Cathy Cashmore</u>	Account Number*	[REDACTED]
Project Location: *	<u>5169 W Yarrow Rd Pocatello ID 83201</u>	Meter Number*	[REDACTED]
<small>Address City, State Zip</small>			
Existing project at location? *	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, total nameplate rating of existing project (kW): *	
Proposed Project*			
Size (kWDC):	<u>3.0 kW</u>	In-Service Date (mm/dd/yyyy)*:	<u>5/15/19</u>
Proposed system is:*		<input type="checkbox"/> Single Phase <input type="checkbox"/> Three Phase	
Project Type *			
<input checked="" type="checkbox"/> Solar		<input type="checkbox"/> Wind	
Number of modules <u>10</u>		Number of turbines _____	
If fixed, approximate tilt from horizon (0-90°) _____		Turbine Manufacturer _____	
Orientation: <input type="checkbox"/> N <input type="checkbox"/> NE <input type="checkbox"/> NW <input checked="" type="checkbox"/> S <input type="checkbox"/> SE <input type="checkbox"/> SW <input type="checkbox"/> E <input type="checkbox"/> W		<input type="checkbox"/> Other (describe) _____	
Tracker? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Battery backup? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Inverter*			
How many?	<u>10</u>	Watt size (each):	<u>300</u>
Manufacturer:		<u>Enphase</u>	Model #: <u>1026</u>
Is inverter UL 1741 or IEEE 1547 listed? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
If no, what protection type? _____			

2. \$100 non-refundable application fee enclosed ck # 6661

3. Project Contact (installer)

Company*	<u>CR Solar Installations</u>	Contact*	<u>JENN ANUNDSON</u>
Email*	<u>Netmeterdocs@crsolarenergy.com</u>	Phone (xxx) xxx-xxxx	[REDACTED]
Mailing Address	<u>300 King St</u>	City	<u>Layton</u>
		State	<u>UT</u>
		Zip	<u>84041</u>

4. Account Holder

<input checked="" type="checkbox"/> I certify that the information provided in this application is correct to the best of my knowledge.			
<input checked="" type="checkbox"/> I understand that the on-site generation and net metering service – including the rate structure and interconnection requirements – are subject to change and that current rates do not represent future pricing.			
<input checked="" type="checkbox"/> I give my permission for Idaho Power to discuss my project and electric usage history with the Project Contact listed above.			
Name (Type or Print) *	<u>Catherine Cashmore</u>	Signature*	<u>[Signature]</u>
Phone*(xxx) xxx-xxxx	[REDACTED]	Email*	<u>cathy.cashmore@gmail.com</u>
		Date*	<u>4/27/19</u>

Once completed, please mail this form and the non-refundable \$100 application fee to:

U.S. Postal delivery:
Idaho Power Company
Attn: Customer Generation, CHQ8
P.O. Box 70
Boise, ID 83707

Express delivery:
Idaho Power Company
Attn: Customer Generation, CHQ8
1221 West Idaho Street
Boise, ID 83702

If you have any questions, please call
208-388-2559 or email CG@idahopower.com

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. IPC-E-23-06

IDAHO POWER COMPANY

ATTACHMENT 2

Sent: Tue 5/7/2019 8:37 AM
To: netmeterdocs@crsolarenergy.com
CC: cathy.cashmore@gmail.com
From: cg@idahopower.com
Subject: Your application is approved! (ID 889)

RE: Solar project for 5169 W Yarrow Rd - Cathy A Cashmore

Hello,

We received your customer generation application on May 6, 2019 and conducted a review for connecting your Solar project at 5169 W Yarrow Rd in Pocatello. We have good news! Our engineers have confirmed that no electrical grid upgrades are needed and you are free to move forward with installing your 3.00 kilowatt system.

Your application approval is good for one year, so you have until May 6, 2020 to install your system and ensure it is operational. If your system isn't operational by May 6, 2020, we'll need a new application and fee to redo the engineering review because a lot can change in a year on our electrical grid.

Now that your application has been approved, here are the steps for getting your project up and running:

Your Steps:

- Install your renewable generation system.
- Pass the state/city electrical inspection. (Electrical inspection schedules vary depending on jurisdiction and time of year. Please check with your local permitting office or ask your installer for an estimated timeframe.)
- Submit a System Verification Form to Idaho Power. This form is our cue to get started on our steps.

Idaho Power's Steps:

- Inspect your system within 10 business days of receiving your System Verification Form.
- Update you when your interconnection process is complete.

You can find forms and detailed information on interconnection requirements at: www.idahopower.com/CustomerGeneration. If you have questions about these processes or the requirements, you can reach us at 208-388-2559 or cg@idahopower.com.

Sincerely,
Idaho Power
Customer Generation Team

TERY16, GISO # 1340304

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. IPC-E-23-06

IDAHO POWER COMPANY


ATTACHMENT 3

Fwd: Cashmore Project

Catherine Cashmore <cathy.cashmore@gmail.com>

Thu 1/21/2021 2:09 PM

To: thain cashmore <nomorecash@hotmail.com>

 1 attachments (587 KB)

Scan_0203.pdf;

----- Forwarded message -----

From: **Catherine Cashmore** <cathy.cashmore@gmail.com>

Date: Thu, Jan 14, 2021 at 11:26 AM

Subject: Re: Cashmore Project

To: Amy Simms <amys@crsolarenergy.com>

Hi Amy,

Here's the signed form. Thank you for covering the fee - let me know what you hear back from them regarding what's required.

My lawyer said suing Idaho Power will likely cost tens of thousands of dollars - so I'm obviously leaning towards the second meter. :)

Cathy

On Thu, Jan 14, 2021 at 8:00 AM Amy Simms <amys@crsolarenergy.com> wrote:

Cathy, I was also very frustrated by this. I can not believe they are going to make you get a second meter and go through all this trouble over 10 days. We will absolutely fill out the paperwork and help you with this. We will get an estimate on how much the meter addition will cost and we can install the meter for you. We would like to cover some of the meter installation costs for you as well. I am so sorry we were not able to get your permit through the state of Idaho faster.

I am told that the first step moving forward is to reapply and pay another net meter application fee. I have filled out the form that requires your signature. Do you have a way to print and sign it and scan it back to me? After I get it from you I will email it to my contact at Idaho Power and copy you to the email. We will cover the application fee. Then I will ask them how we need to proceed with adding a second meter to your property.

Let me know if you have any questions. Have a great day.

On Tue, Jan 12, 2021 at 4:21 PM Catherine Cashmore <cathy.cashmore@gmail.com> wrote:

Hi Amy,

Please see the email below from Idaho Power. Super frustrating. Sounds like we don't have a choice but to meter the two systems separately. Can you guys do that (and how much will it cost)? Do we fill out the new application for the expansion or is that something you guys do?

I have also forwarded this email to my attorney as well who is looking into if we can litigate with Idaho Power. Seems to me they are being completely unreasonable and looking for loopholes so Thain and I will lose our grandfathering status. This status will be very important when we eventually sell our house, so I'm going to fight for it.

Thanks for any insight you can provide,

Cathy

----- Forwarded message -----

From: **LOC. CG** <CG@idahopower.com>

Date: Thu, Jan 7, 2021 at 10:34 AM

Subject: Cashmore Project

To: amys@crsolarenergy.com <amys@crsolarenergy.com>

Cc: cathy.cashmore@gmail.com <cathy.cashmore@gmail.com>, LOC. CG <CG@idahopower.com>

Hi Amy and Cathy,

Amy, thanks for getting back to me yesterday about the Cashmore Project. Per our conversation, here is a summary of the project status and next steps to get it interconnected.

In 2016, a 7.9 KW system installed. This system is grandfathered under the December 2019 PUC order in the IPC-E-18-15 case.

In May of 2019, we received an application to expand the system. Under the PUC order, this expansion qualified for grandfathering if the customer could supply proof that a financial commitment was made prior to December 20, 2019 **and** the project was interconnected within 1 year of the order date. Applications usually expire 1 year from the application review date but the PUC order extended the deadline to December 20th 2020. So this project got a extension on the expiration date from May 6, 2020 to December 20, 2020.

We received a System Verification Form for the project on 12/30/20-however the application for the expansion had expired on 12/20/20. The expansion is no longer eligible for

grandfathering.

For next steps:

A new application for this expansion is required before we can process the System Verification Form. Here is a link to the application: <https://docs.idahopower.com/pdfs/BusinessToBusiness/DEL326.pdf>

The IPUC also explained in its order that, if a customer expands their system, the expansion must be metered separately in order to retain the grandfathered status of the original system. If the expansion is not metered separately, the entire system will lose grandfathered status.

So there are two options:

Keep the expansion with the original system and forfeit grandfathering for the entire system.

Or

Reconfigure the expansion so that it is separately metered. In the separate meter option, the expansion would likely accrue excess energy credits as there would not be significant load on that meter. The customer would need to apply to transfer these credits each year in January to their other meter (transfers are one time in March.) The expansion tied to the second meter will be subject to future changes in the compensation structure. So the 1 kWh to 1 kWh compensation structure that exists today, will likely change in the future. You can read about the excess generation transfer rules here (scroll toward the bottom):

<https://www.idahopower.com/energy-environment/green-choices/solar-power-options-customer-generation/frequently-asked-questions/>

To separately meter the system, a separate service will need to be installed. Pages 35 and 36 of the attached Customer Requirements document show the basic design. If the customer chooses this option, once we receive the application we will assign a distribution designer to the project to work with you further.

Please let us know if you have any additional questions. My direct number is 208-388-5948.

Sincerely,

Patti Best

Idaho Power

Ps. Per your request, below please find the email sent to installers (including CR solar) on January 3 2020 then again on January 6, 2020.

From: LOC. CG
Sent: Monday, January 6, 2020 11:46 AM
To: LOC. CG <CG@idahopower.com>
Subject: Information about On-Site Generation-Fixed Links

Hello,

On Friday we sent out the email below. It has come to our attention that several links were changed over the weekend. Below, please find the same information with updated links.

Thanks!

Idaho Power's Customer Generation Team

We are writing to inform you that on December 20, 2019, the Idaho Public Utilities Commission (IPUC) publicly issued an order in Case No. IPC-E-18-15 reminding Idaho Power, installers, and Idaho Power's customers that Idaho Power's on-site generation tariffs (Schedules 6, 8, and 84), as with all other tariffs, are not contracts and are subject to change at any time upon order of the IPUC.¹ Changes to the on-site generation tariff in the future may include, but are not limited to, modifications to rates, billing components, billing structure, compensation structures, and the value for excess energy produced by the customer's on-site generation system (and thus the amount a customer would be compensated). Therefore, future changes in program structure can profoundly affect the projected economic benefits or payback period of on-site generation systems.

Under the IPUC's order, customers who have not submitted a complete Idaho Power customer

generation application and interconnected with Idaho Power's system by December 20, 2019 are not automatically "grandfathered" under the current net monthly 1:1 kWh offset for the applicable meter site at the originally installed nameplate capacity of the system. However, under the IPUC's order, if a customer (1) made a binding financial commitment to install an on-site generation system prior to or on December 20, 2019, and (2) interconnects the on-site generation system prior to December 20, 2020, the customer may also be eligible to be "grandfathered" under the current compensation structure for on-site generation.

The financial commitment can be an obligation to a third-party installer or supplier. To be eligible, the customer must submit to Idaho Power on or prior to January 19, 2020 (a) an Idaho Power customer generation application to interconnect, and (b) receipts demonstrating that a financial commitment was made on or prior to December 20, 2019. Please note that, generally stated, "grandfathering" does not apply to the rate structure and rates paid for consumption of electric power. Please refer to the full order of the IPUC for additional information and the specific terms and conditions.

The IPUC's order is consistent with the Idaho Residential Energy System Disclosure Act (Idaho Code §§48-1801-§§48-1809), which requires installers to provide the following disclosure statement in certain documentation provided to their customers: "LEGISLATIVE OR REGULATORY ACTION MAY AFFECT OR ELIMINATE ONE'S ABILITY TO SELL OR GET CREDIT FOR ANY EXCESS POWER GENERATED BY THE SYSTEM AND MAY AFFECT THE PRICE OR VALUE OF THAT POWER."

More information about customer generation, including compensation structure, technical requirements, and the application process can be found at idahopower.com/customergeneration. More information about the [case](#) and the [order](#) can be found at www.puc.idaho.gov. In the past, and as reiterated at recent public hearings in the case under which the order was issued, some of Idaho Power's customers have stated that some on-site generation installers informed their customers that tariffs and rates for on-site generation would not change in the future. In accordance with the order and Idaho's statute, we plan to, and we are encouraging all on-site generation installers to, inform pending and future on-site generation customers of the IPUC's December 20 order and that tariffs and rates for on-site generation can change materially in the future.

If you have questions, about the on-site generation tariff and requirements, please contact the customer generation team at 208-388-2559.

Sincerely,

Your Idaho Power Customer Generation Team

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. IPC-E-23-06

IDAHO POWER COMPANY

ATTACHMENT 4

Fwd: Customer Generation Application Information from Idaho Power

Catherine Cashmore <cathy.cashmore@gmail.com>

Thu 1/21/2021 2:18 PM

To: thain cashmore <nomorecash@hotmail.com>

----- Forwarded message -----

From: **McWinn, Billie** <BMcWinn@idahopower.com>

Date: Thu, Jan 9, 2020 at 5:01 PM

Subject: Customer Generation Application Information from Idaho Power

To:

Dear Customer,

Below is a follow-up email to the conversation we had by phone within the last couple of days. You may have already provided your evidence of financial commitment or payment, and if so this will be informational and for your records.

All my best,

Billie Jo

.....
We previously received your application to install an on-site generation system and interconnect to Idaho Power's electrical system. We want to make you aware that **under a recent order issued by the Idaho Public Utilities Commission (IPUC), you need to take additional action promptly in order to preserve certain potential benefits.**

On December 20, 2019, the IPUC publicly issued an order in Case No. IPC-E-18-15, which provided that customers like you who applied to interconnect on-site generation systems on or before December 20, 2019, but have not yet completed the interconnection process, must meet certain criteria in order to remain eligible for the current net monthly kilowatt-hour credit compensation structure (commonly referred to as a "1-to-1 offset") for on-site generation. To remain eligible, you must (1) provide to Idaho Power by January 19, 2020 evidence of a financial commitment to install an on-site generation system and (2) have the system installed by December 20, 2020.

Under the IPUC's order, the financial commitment can be an obligation to a third-party installer or supplier. To be eligible, you must submit receipts or a fully executed agreement demonstrating that a binding financial commitment was made on or prior to December 20, 2019. You may submit documents by responding to this email and attaching copies of your receipt(s) and/or agreement or mailing them to the address below. Please include your Idaho Power account number and service address as a reference when you are submitting the required documents.

If Idaho Power does not receive that information by January 19, 2020, or if the system is not

installed by December 20, 2020, you will be subject to future changes in on-site generation tariffs and offering structure. Please note that those changes could profoundly affect items such as the compensation structure for excess generation, and thus the economics of the purchase or lease of an on-site generation system. For customers eligible for grandfathering under the current compensation structure, grandfathering will only apply to the customer at the meter site at the originally installed nameplate capacity of the system. Please note that, generally stated, this "grandfathering" does not apply to the rate structure and rates paid for consumption of electric power.

For customers who do not meet the criteria to be grandfathered, please note that Idaho Power's on-site generation tariffs, Schedules 6, 8, and 84, as with all tariffs, are not contracts and are subject to change at any time upon order of the IPUC. Changes to the on-site generation tariff in the future may include, but are not limited to, modifications to rates, billing components, billing structure, compensation structures, and the value for excess energy produced by (and thus the amount a customer would be compensated for) the customer's on-site generation system.

The IPUC's order is consistent with the Idaho Residential Energy System Disclosure Act, which requires a disclosure that reminds customers that legislative or regulatory actions can affect or eliminate one's ability to sell or get credit for any excess power generated by the system and may affect the price or value of that power.

More information about customer generation, including compensation structure, technical requirements, and the application process can be found at idahopower.com/customergeneration. More information about the [case](#) and the [order](#) can be found at www.puc.idaho.gov.

If you have questions, about the on-site generation tariff and requirements, please contact the Customer Care Team at 800-632-6605.

We appreciate the opportunity to serve you.

Sincerely,

Your Idaho Power Customer Generation Team

cg@idahopower.com

Idaho Power

Attn: Customer Generation

P.O. Box 70, Boise, ID 83707

IDAHO POWER LEGAL DISCLAIMER

This transmission may contain information that is privileged, confidential and/or exempt from

disclosure under applicable law. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or use of the information contained herein (including any reliance thereon) is **STRICTLY PROHIBITED**. If you received this transmission in error, please immediately contact the sender and destroy the material in its entirety, whether in electronic or hard copy format. Thank you.

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. IPC-E-23-06

IDAHO POWER COMPANY

ATTACHMENT 5

From: [VM.CG](#)
To: [VM.CG](#)
Subject: Second Notice: Information about your Customer Generation Application
Date: Tuesday, January 14, 2020 12:14:00 PM

Hello,

We previously received your application to install an on-site generation system and interconnect to Idaho Power's electrical system. We want to make you aware that **under a recent order issued by the Idaho Public Utilities Commission (IPUC), you need to take additional action promptly in order to preserve certain potential benefits.**

On December 20, 2019, the IPUC publicly issued an order in Case No. IPC-E-18-15, which provided that customers like you who applied to interconnect on-site generation systems on or before December 20, 2019, but have not yet completed the interconnection process, must meet certain criteria in order to remain eligible for the current net monthly kilowatt-hour credit compensation structure (commonly referred to as a "1-to-1 offset") for on-site generation. To remain eligible, you must (1) provide to Idaho Power by January 19, 2020 evidence of a financial commitment to install an on-site generation system and (2) have the system installed by December 20, 2020.

Under the IPUC's order, the financial commitment can be an obligation to a third-party installer or supplier. To be eligible, you must submit receipts or a fully executed agreement demonstrating that a binding financial commitment was made on or prior to December 20, 2019. You may submit documents by responding to this email and attaching copies of your receipt(s) and/or agreement or mailing them to the address below. Please include your Idaho Power account number and service address as a reference when you are submitting the required documents.

If Idaho Power does not receive that information by January 19, 2020, or if the system is not installed by December 20, 2020, you will be subject to future changes in on-site generation tariffs and offering structure. Please note that those changes could profoundly affect items such as the compensation structure for excess generation, and thus the economics of the purchase or lease of an on-site generation system. For customers eligible for grandfathering under the current compensation structure, grandfathering will only apply to the customer at the meter site at the originally installed nameplate capacity of the system. Please note that, generally stated, this "grandfathering" does not apply to the rate structure and rates paid for consumption of electric power.

For customers who do not meet the criteria to be grandfathered, please note that Idaho Power's on-site generation tariffs, Schedules 6, 8, and 84, as with all tariffs, are not contracts and are subject to change at any time upon order of the IPUC. Changes to the on-site generation tariff in the future may include, but are not limited to, modifications to rates, billing components, billing structure, compensation structures, and the value for excess energy produced by (and thus the amount a customer would be compensated for) the customer's on-site generation system.

The IPUC's order is consistent with the Idaho Residential Energy System Disclosure Act, which requires a disclosure that reminds customers that legislative or regulatory actions can affect or eliminate one's ability to sell or get credit for any excess power generated by the system and may affect the price or value of that power.

More information about customer generation, including compensation structure, technical requirements, and the application process can be found at idahopower.com/customergeneration. More information about the [case](#) and the [order](#) can be found at www.puc.idaho.gov.

If you have questions, about the on-site generation tariff and requirements, please contact the Customer Care Team at 800-632-6605.

We appreciate the opportunity to serve you.

Sincerely,

Your Idaho Power Customer Generation Team
cg@idahopower.com

Idaho Power
Attn: Customer Generation
P.O. Box 70, Boise, ID 83707



Tue 1/14/2020 12:15 PM

LOC CG

Second Notice: Information about your Customer Generation Application

[Redacted]

Hello,

We previously received your application to install an on-site generation system and interconnect to Idaho Power's electrical system. We want to make you aware that under a recent order issued by the Idaho Public Utilities Commission (IPUC), you need to take additional action promptly in order to preserve certain potential benefits.

On December 20, 2019, the IPUC publicly issued an order in Case No. IPC-E-18-15, which provided that customers like you who applied to interconnect on-site generation systems on or before December 20, 2019, but have not yet completed the interconnection process, must meet certain criteria in order to remain eligible for the current net monthly kilowatt-hour credit compensation structure (commonly referred to as a "1-to-1 offset") for on-site generation. To remain eligible, you must (1) provide to Idaho Power by January 19, 2020 evidence of a financial commitment to install an on-site generation system and (2) have the system installed by December 20, 2020.

Under the IPUC's order, the financial commitment can be an obligation to a third-party installer or supplier. To be eligible, you must submit receipts or a fully executed agreement demonstrating that a binding financial commitment was made on or prior to December 20, 2019. You may submit documents by responding to this email and attaching copies of your receipt(s) and/or agreement or mailing them to the address below. Please include your Idaho Power account number and service address as a reference when you are submitting the required documents.

If Idaho Power does not receive that information by January 15, 2020, or if the system is not installed by December 20, 2020, you will be subject to future changes in on-site generation tariffs and offering structure. Please note that those changes could profoundly affect items such as the compensation structure for excess generation, and thus the economics of the purchase or lease of an on-site generation system. For customers eligible for grandfathering under the current compensation structure, grandfathering will only apply to the customer at the meter site at the originally installed nameplate capacity of the system. Please note that, generally stated, this "grandfathering" does not apply to the rate structure and rates paid for consumption of electric power.

For customers who do not meet the criteria to be grandfathered, please note that Idaho Power's on-site generation tariffs, Schedules 6, 8, and 8A, as with all tariffs, are not contracts and are subject to change at any time upon order of the IPUC. Changes to the on-site generation tariff in the future may include, but are not limited to, modifications to rates, billing components, billing structure, compensation structures, and the value for excess energy produced by (and thus the amount a customer would be compensated for) the customer's on-site generation system.

The IPUC's order is consistent with the Idaho Residential Energy System Disclosure Act, which requires a disclosure that reminds customers that legislative or regulatory actions can affect or eliminate one's ability to sell or get credit for any excess power generated by the system and may affect the price or value of that power.

More information about customer generation, including compensation structure, technical requirements, and the application process can be found at idahopower.com/customergeneration. More information about the [case](#) and the [order](#) can be found at www.iuc.idaho.gov.

If you have questions, about the on-site generation tariff and requirements, please contact the Customer Care Team at 800-632-6605.

We appreciate the opportunity to serve you.

Sincerely,

Your Idaho Power Customer Generation Team
cg@idahopower.com

Idaho Power
Attn: Customer Generation
P.O. Box 70, Boise, ID 83707

Sent To:

[Redacted]

'cathy.cashmore@gmail.com';

[Redacted]

[REDACTED]

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. IPC-E-23-06

IDAHO POWER COMPANY

ATTACHMENT 6

Fwd: [EXTERNAL]Fwd: CR Solar Contract

Catherine Cashmore <cathy.cashmore@gmail.com>

Thu 1/21/2021 2:10 PM

To: thain cashmore <nomorecash@hotmail.com>

----- Forwarded message -----

From: **LOC. CG** <CG@idahopower.com>

Date: Tue, Jan 21, 2020 at 8:50 AM

Subject: RE: [EXTERNAL]Fwd: CR Solar Contract

To: Catherine Cashmore <cathy.cashmore@gmail.com>

Thank you, we received your documents

CG Team

From: Catherine Cashmore <cathy.cashmore@gmail.com>

Sent: Monday, January 20, 2020 8:06 AM

To: LOC. CG <CG@idahopower.com>

Subject: Fwd: [EXTERNAL]Fwd: CR Solar Contract

KEEP IDAHO POWER SECURE! External emails may request information or contain malicious links or attachments. Verify the sender before proceeding, and check for additional warning messages below.

CR Solar was supposed to send this to you. Please note the date sent was prior to your deadline.

Catherine Cashmore

----- Forwarded message -----

From: **Mallory Jackson** <mallory@crlighting.net>

Date: Fri, Jan 17, 2020 at 9:43 AM

Subject: Re: [EXTERNAL]Fwd: CR Solar Contract

To: Catherine Cashmore <cathy.cashmore@gmail.com>

Cc: Amy Simms <amy.simms@crlighting.net>

Good Morning Ms. Cashmore,

I am so sorry, I sent you your proposal! Attached is a copy of your signed contract, as well as a copy of the check for your deposit. Just so you are aware, Amy received an email yesterday from Idaho Power regarding submitting additional information for our Idaho Power customer's that were installed prior to the 12/20/2019 date. We are in the process of gathering all of the required information to send them on our customer's behalf. By all means please send this over to them as well. It can't hurt to give them multiple confirmations of when your system was purchased. If you have any other questions or concerns please do not hesitate to contact me. I hope you have a wonderful rest of your day!

Thank you,

Mallory Jackson

Administrative Assistant

CR Solar

801-444-5130

On Fri, Jan 17, 2020 at 2:43 AM Catherine Cashmore <cathy.cashmore@gmail.com> wrote:

Mallory,

Please send them something via email to cg@idahopower.com showing we paid you? We are right up against the deadline so if that could happen today that would be great.

Thanks,

Cathy

----- Forwarded message -----

From: **LOC. CG** <CG@idahopower.com>

Date: Wed, Jan 15, 2020 at 8:17 PM

Subject: RE: [EXTERNAL]Fwd: CR Solar Contract

To: Catherine Cashmore <cathy.cashmore@gmail.com>, LOC. CG <CG@idahopower.com>

Hi Catherine,

This proposal doesn't show that a binding financial commitment was made. Do you have any documents that show you made a financial commitment on or before 12/20/2019? Examples of documents we've accepted are signed and dated solar purchase agreements/contracts or loan agreements, receipts of down payments, copy of check to solar company, etc. If you have something like this that shows the transaction date of 12/20/19 or before, that would likely suffice.

Thank you,

Suzanne Smith

CUSTOMER GENERATION TEAM

Idaho Power

208-388-2559

From: Catherine Cashmore <cathy.cashmore@gmail.com>

Sent: Wednesday, January 15, 2020 6:49 PM

To: LOC. CG <CG@idahopower.com>

Subject: [EXTERNAL]Fwd: CR Solar Contract

KEEP IDAHO POWER SECURE! External emails may request information or contain malicious links or attachments. Verify the sender before proceeding, and check for additional warning messages below.

Please see proof attached below of purchase of extra solar panels in 2019.

Catherine cashmore

5169 w yarrow rd

Pocatello id 83201

----- Forwarded message -----

From: **Mallory Jackson** <mallory@crlighting.net>

Date: Thu, Jan 9, 2020 at 3:16 PM

Subject: CR Solar Contract

To: <cathy.cashmore@gmail.com>

Good Afternoon Cathy,

Dave Driscoll let me know you needed a copy of your contract. I have attached this for you. He also mentioned that you received an email from Idaho Power requesting some documents. If you can let me know what documents they are needing, I will go through your file and send it over.

Thank you,

Mallory Jackson

Administrative Assistant

CR Solar

801-444-5130

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**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. IPC-E-23-06

IDAHO POWER COMPANY

ATTACHMENT 7

From: [VM_CG](#)
To: [VM_CG](#)
Cc: [VM_CG](#)
Subject: On-Site Generation System Documentation
Date: Friday, January 31, 2020 9:32:00 AM

Hello,

Thank you for your timely submission of requested documentation. Under the Idaho Public Utilities Commission Order 34509, if you made a binding financial commitment to install an on-site generation system, such as solar panels, prior to or on December 20, 2019 you may be eligible to be “grandfathered” under the current compensation structure for on-site generation. We have received your documentation showing a financial commitment for your system was made prior to December 20, 2019.

Per the commission’s order, to be eligible for grandfathering, systems must also be installed and interconnected by December 20, 2020.

More information about customer generation, including compensation structure, technical requirements, and the application process can be found at idahopower.com/customergeneration. More information about the [case](#) and the [order](#) can be found at www.puc.idaho.gov.

If you have additional questions, you can call our Customer Care team at (800) 632-6605 or send us an email at solutions@idahopower.com.

Sincerely,

Your Idaho Power Customer Generation Team

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. IPC-E-23-06

IDAHO POWER COMPANY

ATTACHMENT 8

From: [Best, Patti](#)
To: netmeterdocs@crsolarenergy.com
Subject: Cashmore project
Date: Friday, May 15, 2020 10:27:00 AM

Hi. In May of 2019 we received an application for Cathy Cashmore, 5169 W Yarrow Rd in Pocatello.
Can you provide a status update?

Thanks.

Patti Best

Idaho Power

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. IPC-E-23-06

IDAHO POWER COMPANY

ATTACHMENT 9

From: [Best, Patti](#)
To: cathy.cashmore@gmail.com
Cc: netmeterdocs@crsolarenergy.com
Subject: Solar PV System
Date: Tuesday, October 20, 2020 9:07:00 AM

Hi Cathy,

I wanted to follow up with you about your application to expand your solar PV system, submitted in May 2019.

Our records show a 7.9 kW 28 panel system was installed in 2016. This system is grandfathered under the 1 to 1 kWh compensation structure.

In May 2019, we received an application to add an additional 10 panels (3 kW). We also received proof that a financial commitment was made for this expansion prior to December 20, 2019. Under a PUC order, if the expansion is complete by December 20, 2020, it will qualify for grandfathering too. If not, the expansion must be metered separately to preserve the grandfathered status of your original system.

I wanted to check with you on the status of this expansion.

Did you decide to move forward with it?

Thank you,
Patti Best
Idaho Power

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. IPC-E-23-06

IDAHO POWER COMPANY

ATTACHMENT 10

From: [VM_CG](#)
To: [Catherine Cashmore](#)
Cc: netmeterdocs@crsolarenergy.com
Subject: Solar PV System Additional Action Needed
Date: Monday, November 30, 2020 12:08:00 PM

Hi Cathy,

I wanted to follow up with you again about your solar PV system. I am glad you got your system installed. However, it has not yet finished our interconnection process. To complete the interconnection process, we need a System Verification Form certifying the expansion meets all codes and has passed the state/city electrical inspection. Here is a link to that form.

<https://docs.idahopower.com/pdfs/BusinessToBusiness/CRR197.01.pdf>

It looks like we did receive proof that a financial commitment was made for the system prior to December 2019. **If the expansion interconnection process is complete by December 20, 2020, it too will qualify for grandfathering. If it is not completed, the entire system could lose grandfathering status.**

Please submit the System Verification form as soon as possible so that we may conduct our inspection and complete the interconnection process.

Let us know if you have any questions.

Patti Best
Idaho Power

From: Catherine Cashmore <cathy.cashmore@gmail.com>
Sent: Tuesday, October 20, 2020 9:11 AM
To: Best, Patti <PBest@idahopower.com>
Subject: [EXTERNAL]Re: Solar PV System

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Hello,

Yes additional panels were installed.

Cathy

On Tue, Oct 20, 2020 at 9:07 AM Best, Patti <PBest@idahopower.com> wrote:

Hi Cathy,
I wanted to follow up with you about your application to expand your solar PV system, submitted in May 2019.

Our records show a 7.9 kW 28 panel system was installed in 2016. This system is grandfathered under the 1 to 1 kWh compensation structure.

In May 2019, we received an application to add an additional 10 panels (3 kW). We also received proof that a financial commitment was made for this expansion prior to December 20, 2019. Under a PUC order, if the expansion is complete by December 20, 2020, it will qualify for grandfathering too. If not, the expansion must be metered separately to preserve the grandfathered status of your original system.

I wanted to check with you on the status of this expansion.

Did you decide to move forward with it?

Thank you,
Patti Best
Idaho Power

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**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. IPC-E-23-06

IDAHO POWER COMPANY

ATTACHMENT 11

From: [VM_CG](#)
To: cathy.cashmore@gmail.com; netmeterdocs@crsolarenergy.com
Cc: [VM_CG](#)
Subject: Expiration of Idaho Power Net Metering/Onsite Generation application for ID 889
Date: Tuesday, December 22, 2020 6:47:44 AM

Cathy A Cashmore,

On 5/6/2019, Idaho Power received an application to install an on-site generation system at 5169 W Yarrow Rd. According to our records, that system has not been completed and the application is now considered expired. As noted in the rules for net metering and onsite generation, outlined in Schedule 72-Interconnections to Non-Utility Generation:

Applications that are not completed within one year of the initial Feasibility Review are considered expired. Customers requesting connection or approval of expired applications are required to resubmit a completed application form and \$100 application fee, and are subject to the full application process.

The purpose of the Feasibility Review is to ensure the components of the electrical grid in your area can handle the energy load of the proposed on-site generation system. In a 12-month period, much can change to increase the demand on the electrical grid, such as population growth or existing customers using more of the system. A new feasibility review ensures the current demands of the electrical grid can support an on-site generation system safely.

If you have any questions, you can reach us at 208-388-2559 or by email at cg@idahopower.com.

Sincerely,
Idaho Power
Customer Generation Team

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. IPC-E-23-06

IDAHO POWER COMPANY

ATTACHMENT 12

Goicoechea Allen, Megan

From: Office Team <netmeterdocs@crsolarenergy.com>
Sent: Wednesday, December 30, 2020 11:16 AM
To: VM_CG
Cc: cathy.cashmore@gmail.com
Subject: [EXTERNAL]Cashmore ID
Attachments: Cashmore SVF ID.pdf

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**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. IPC-E-23-06

IDAHO POWER COMPANY

ATTACHMENT 13

Customer Generation System Verification Form

Solar PV Projects



Instructions:

This System Verification Form is required after the proposed onsite renewable generation system is installed and after successful completion of a state or city electrical inspection. Idaho Power prefers that this form be completed by a licensed electrician, solar installer, NABCEP certified individual or an engineer or other qualified persons as accepted by Idaho Power. In lieu of professional certification, documentation may be required including cut sheets and/or invoices for installed components. If invoices are provided, financial information is not required and can be excluded if desired.

For rates 01 & 07 (Residential and Small General Service): upon receipt, Idaho Power will conduct a site visit within 10 business days to check for compliance with Schedule 72, Interconnections to Non-Utility Generation and change the meter. It is not necessary to be present for this visit. For Rates 09, 19, and 24, Idaho Power will contact you to discuss next steps.

1. Project Information *All Fields Required*

Account Holder	<u>Cathy Cashmore</u>	Account Number	<u>[REDACTED]</u>
<i>Must be the customer/account holder on the Idaho Power account</i>			
Project Location:	<u>5169 W. Yarrow Road Pocatello, ID 83201</u>	Meter Number	<u>[REDACTED]</u>
<i>Address</i>		<i>City, State Zip</i>	
Electrical Permit Number	<u>WEB2010-05164</u>	Final Electrical Inspection Completion Date	<u>12/29/2020</u>
Are there any access issues to the meter (unsecured dogs, etc.)? <u>NO</u>			

2. Final Installation Information *All Fields Required*

Project Nameplate Capacity	<u>3.1</u> kW DC	<u>3.1</u> kW AC	<input checked="" type="checkbox"/> Single Phase	<input type="checkbox"/> Three Phase
<i>Maximum System Size: 25 kW AC Residential and Small General Service; 100 kW AC Large Commercial, Industrial, Irrigation</i>				
Solar: # of Modules	<u>10</u>	Watts/module (DC)	<u>310</u>	Manufacturer <u>Jinko Solar</u> Model <u>JKM 310</u>
Tracker:	<input checked="" type="checkbox"/> None	<input type="checkbox"/> Single Axis	<input type="checkbox"/> Two Axis	Battery Backup: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Inverter(s)				
#	<u>1</u>	Nameplate Capacity (VA):	<u>3500</u>	Manufacturer <u>Enphase</u> Model # <u>IQ7</u> Voltage <u>240</u>
#		Nameplate Capacity (VA):		Manufacturer _____ Model # _____ Voltage _____
Are inverters UL 1741 or IEEE1547 listed? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, what protection type? _____				

3. Professional Certification *All Fields Required*

I, the undersigned, certify the above information is correct and the system meets the requirements of Idaho Schedule 72 Interconnections to Non-Utility Generation. I also certify that:				
<input checked="" type="checkbox"/> System meets all required codes and has passed the city/state electrical inspection.				
<input checked="" type="checkbox"/> System is operational, breaker and inverter are on. If applicable, the inverter is programmed.				
<input checked="" type="checkbox"/> The AC disconnect is in the open or off position.				
<input checked="" type="checkbox"/> Required placards are in place. If disconnect is more than 10 feet or not visible from the meter, permanent directions to the disconnect have been placed next to the meter.				
Name (Type or Print)	<u>Thomas Simms</u>	Signature	_____	
Phone*(xxx) xxx-xxxx	<u>801-888-2996</u>	Email	<u>tsimms@crsolarenergy.com</u>	Date <u>12/29/2020</u>
I am: (check all that apply) <input checked="" type="checkbox"/> Electrician <input type="checkbox"/> NABCEP certified <input type="checkbox"/> Other: _____				
<input type="checkbox"/> Engineer <input checked="" type="checkbox"/> Solar Company/Installer <input type="checkbox"/> If Other, documentation is included per instructions.				

Once completed, please email or mail this form to: cg@idahopower.com

U.S. Postal Delivery: Idaho Power Company Attn: Customer Generation, CHQ 8 P.O. Box 70 Boise, ID 83707
Express Delivery: Idaho Power Company Attn: Customer Generation, CHQ 8 1221 West Idaho Street Boise, ID 83702

Questions? Call 208-388-2559 or email cg@idahopower.com

Complete for multiple inverter models

Inverter Details	
Manufacturer: _____	Model #: _____
Total number of inverters: _____	Inverter watt size (each): _____
Is inverter UL 1741 or IEEE 1547 listed? <input type="checkbox"/> Yes <input type="checkbox"/> No	If no, what protection type? _____
<hr/>	
Manufacturer: _____	Model #: _____
Total number of inverters: _____	Inverter watt size (each): _____
Is inverter UL 1741 or IEEE 1547 listed? <input type="checkbox"/> Yes <input type="checkbox"/> No	If no, what protection type? _____
<hr/>	
Manufacturer: _____	Model #: _____
Total number of inverters: _____	Inverter watt size (each): _____
Is inverter UL 1741 or IEEE 1547 listed? <input type="checkbox"/> Yes <input type="checkbox"/> No	If no, what protection type? _____

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. IPC-E-23-06

IDAHO POWER COMPANY

ATTACHMENT 14

From: [VM_CG](#)
To: [Office Team](#); [VM_CG](#)
Cc: cathy.cashmore@gmail.com
Subject: RE: [EXTERNAL]Cashmore ID
Date: Wednesday, December 30, 2020 11:42:35 AM
Attachments: [Expiration of Idaho Power Net MeteringOnsite Generation application for ID 889.msg](#)
[image002.jpg](#)

Hello CR Solar,

Thank you for submitting the system verification form for this expansion project. This project application expired on 12/20/2020 and you received an email on 12/22/2020 (attached)

This project will require a new application and \$100 application fee. Once we receive that via mail, we can proceed with the completion of this project.

If you have any other questions, please feel free to respond to this email.

Thanks

CG Team

From: Office Team <netmeterdocs@crsolarenergy.com>
Sent: Wednesday, December 30, 2020 11:16 AM
To: LOC. CG <CG@idahopower.com>
Cc: cathy.cashmore@gmail.com
Subject: [EXTERNAL]Cashmore ID

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**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. IPC-E-23-06

IDAHO POWER COMPANY

ATTACHMENT 15

Customer Generation Application - Solar PV Projects



This application is an interconnection request for existing Idaho Power customers who wish to install solar PV. Upon receipt of the application and fee, Idaho Power will review the project and determine if any upgrades to the electrical grid are needed. If no upgrades are needed, customer will receive an approval to proceed. Application and fee expire one year after review date. Visit www.idahopower.com/CustomerGeneration for Idaho Power's tariff schedules, interconnection and credit transfer eligibility requirements.

All customer generation systems must satisfy the requirements of Schedule 72, Interconnections to Non-Utility Generation. Upon completion of the interconnection process, customers will take service under one of the following schedules in Idaho Power's Tariff:

- Idaho Residential customers - Schedule 06, Residential Service On-Site Generation
- Idaho Small General Service customers - Schedule 08, Small General Service On-Site Generation
- All Oregon customers, and Idaho Large Commercial, Irrigation and Industrial customers - Schedule 84, Customer Energy Production/Net Metering Service

1. Project Information All Fields Required

Account Holder	Cathy Cashmore	Account Number	[REDACTED]
<i>Must be the customer/account holder on the Idaho Power account</i>			
Project Location	5169 W Yarrow Rd. Pocatello, ID 83201	Meter Number	[REDACTED]
<i>Address</i>		<i>City, State Zip</i>	
Current Rate Schedule	<input type="checkbox"/> Will property be used for commercial purposes? (home business, crypto currency mining)		
Is this an Expansion of an existing project at location? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Project Nameplate Capacity	3.1 kW DC 3.5 kW AC	<input checked="" type="checkbox"/> Single Phase <input type="checkbox"/> Three Phase	
<i>Maximum System Size: 25 kW AC Residential and Small General Service; 100 kW AC Large Commercial, Industrial, Irrigation.</i>			
# of Modules	10	Watts/module (DC)	310
Manufacturer	Jinko	Model	JKM 310
Tracker:	<input checked="" type="checkbox"/> None <input type="checkbox"/> Single Axis <input type="checkbox"/> Two Axis		
Battery Backup:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Inverter(s)			
#1	Nameplate capacity each (VA): 3500	Manufacturer	Enphase
		Model #	IQ7
		Voltage	
#	Nameplate capacity each (VA):	Manufacturer	
		Model #	
		Voltage	
Is inverter UL 1741 or IEEE1547 listed? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			

2. Project Contact (installer) All Fields Required

Company	CR Solar	Contact	Amy Simms cell [REDACTED]
State	UT	Email	amys@crsolarenergy.com
		Phone (xxx) xxx-xxxx	801-444-5130

3. Account Holder Acknowledgement

I authorize Idaho Power to discuss my interconnection request and on-site generation project, as well as share information about my electric usage history, with the Project Company listed above. I further authorize such Project Company to act on my behalf to complete the necessary documentation and requirements to interconnect my on-site generation system. (If customer does not initial this authorization, all of Idaho Power's communications, information-sharing, and interconnection requirements for this project must be handled directly with the customer.)

The following acknowledgments must be initialed for Idaho Power to complete its review of this application

I certify that the information provided in this application is correct to the best of my knowledge.
 I understand that the net metering program design is subject to change including, but not limited to, the interval length over which netting occurs, compensation for excess generation and the interconnection requirements for on-site generation systems.

I UNDERSTAND THAT LEGISLATIVE OR REGULATORY ACTION MAY AFFECT OR ELIMINATE MY ABILITY TO SELL OR GET CREDIT FOR ANY EXCESS POWER GENERATED BY THE SYSTEM AND MAY AFFECT THE PRICE OR VALUE OF THAT POWER. (ID RESIDENTIAL ENERGY SYSTEM DISCLOSURE ACT, ID CODE §§48-1801-§48-1809)

Name (Type or Print)	Cathy Cashmore	Signature	<i>Cathy Cashmore</i>
Phone (xxx) xxx-xxxx	[REDACTED]	Email	cathy.cashmore@gmail.com
		Date	1/14/21

Once completed, please mail this form and the non-refundable \$100 application fee to:

U.S. Postal delivery:	Idaho Power Company Attn: Customer Generation, CHQ 8 P.O. Box 70, Boise ID 83707	Express: Idaho Power Company delivery: Attn: Customer Generation, CHQ 8 1221 West Idaho St, Boise ID 83702	208-388-2559 or email cg@idahopower.com
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DEL326 09/2020

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. IPC-E-23-06

IDAHO POWER COMPANY

ATTACHMENT 16

From: [Catherine Cashmore](#)
To: [Best, Patti](#)
Subject: Re: [EXTERNAL]5169 W Yarrow Rd Additional Panels
Date: Wednesday, June 02, 2021 4:57:43 PM

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Hi Patti,

Yes please withdraw the application dated January 21 2021 to separately meter the additional panels as long as this leaves the grandfathering of our additional panels intact.

Thanks,

Cathy

On Tue, Jun 1, 2021 at 3:29 PM Best, Patti <PBest@idahopower.com> wrote:

Hi Catherine,

Thank you for the update.

I'd like to confirm that you would like to withdraw the application submitted on January 21, 2021 to separately meter these panels.

Please let us know.

Thank you

Patti Best

Idaho Power

From: Catherine Cashmore <cathy.cashmore@gmail.com>
Sent: Wednesday, May 26, 2021 9:41 AM
To: Best, Patti <PBest@idahopower.com>; chris.hecht@puc.idaho.gov
Subject: [EXTERNAL]5169 W Yarrow Rd Additional Panels

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Hello,

The additional 10 solar panels installed at 5169 W Yarrow in June of 2019 have now been isolated in order to power our backup battery system exclusively.

This should resolve our appeal filed with the PUC and eliminate the need for a net meter on the 2019 addition. Please let us know if there is anything else that needs to be done.

Sincerely,

Thain and Catherine Cashmore

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**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. IPC-E-23-06

IDAHO POWER COMPANY

ATTACHMENT 17

1/24/2023

Cathy Cashmore
5169 W Yarrow Rd
Pocatello, ID 83201-9028

Subject: On-Site Generation: Exceedance of Nameplate Capacity / NMID: 889

Dear Cathy Cashmore,

We are writing about your Solar PV system located at 5169 W Yarrow Rd, Pocatello, ID.

In 2016, Idaho Power approved a 28 panel, 7.98 kW system for interconnection. The system came online in June 2016. In 2019, Idaho Power received an application to expand that system. The system expansion did not complete the interconnection process and it is our understanding that those additional panels were reconfigured as an off-grid system. The system remains approved at 28 panels and 7.98 kW.

A solar system size determines the maximum amount of power it can produce and push back to the grid when the home has zero usage. In order for a solar system to export more than what it is rated to produce (7.98 kw for your system) there must be additional generation (inverters and modules) connected. In the months of April, May, and June of 2022, Idaho Power noted that the on-site Solar generation system pushed excess generation to Idaho Power beyond the approved nameplate capacity of **7.98 KW**.

An exceedance of approved capacity indicates that system modifications have been made, increasing the capacity of the system.

Under the rules for on-site generation ([Schedule 68](#) Interconnections to Customer Distributed Energy Resources), customer's modifying existing systems must submit a new application and complete the interconnection process. Modifications include additional solar panels, new inverters and adding batteries. Modifications that have not completed the interconnection process are considered unauthorized installations and expansions. These systems generate electricity and can feed that electricity back onto the electrical grid. The rules for interconnection help ensure the integrity of Idaho Power's system and the safety of Idaho Power crews that are working in the area.

We would like to work with you to get this situation remedied as soon as possible. Under the terms of Schedule 68, unauthorized installations and expansions must be disconnected at the AC disconnect or at the breaker until the situation is resolved. You have until January 26, 2024 to either complete the interconnection process or permanently disable the unauthorized installation. Failure to do so may result in termination of service.

To interconnect the system, please complete the following steps:

1. Fill out a Customer Generation application and submit along with the \$100 application fee. Applications are available at www.idahopower.com/customergeneration Idaho Power will review the application to ensure it is complete, and then conduct an engineering review of the Idaho Power equipment servicing the property. You will receive notification when the review is complete.
3. Assuming no upgrades are needed, ensure the installation complies with Schedule 68. This tariff can be found at www.idahopower.com/customergeneration.
4. Pass a state electrical inspection of the installation.
5. Notify Idaho Power upon successful completion of the state electrical inspection by submitting a System Verification Form. Idaho Power will then conduct a separate inspection to ensure compliance with Schedules 68.

Please note: If additional panels, beyond the approved 28, have been connected in parallel, you risk losing legacy (grandfathered) status of the original system. If panels have been added, there are two options:

- Retain legacy status by separately metering or removing the additional panels. If the additional panels are separately metered, the original system will retain legacy status. The additional panels will not receive legacy treatment. Information about setting up a separate service can be found in the installation and testing requirements section of our website at idahopower.com/customergeneration.
- Keep the additional panels behind the existing net meter and forfeit legacy status for the original system.

As a reminder, please disconnect any modifications until you have completed the interconnection process or they have been permanently removed.

The rules for onsite generation, including Schedule 68, the application forms and information about separately metering systems can be found at idahopower.com/customergeneration. If you have any questions, please do not hesitate to contact us at 208-388-2559. Sincerely,

Idaho Power Customer Generation Team

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. IPC-E-23-06

IDAHO POWER COMPANY

ATTACHMENT 18

 **Print**

<u>Permit Number</u>	<u>Permit Type</u>	<u>Site Address</u>	<u>Site City</u>	<u>Zip Code</u>	<u>Site Number</u>	<u>Applicant Name</u>	<u>Owner Name</u>	<u>Contractor Name</u>	<u>Contractor License #</u>	<u>Job Value</u>	<u>Permit Fee</u>	<u>Status</u>	<u>Issued Date</u>	<u>Expiration Date</u>
WEB2010-05164	ELECTRICAL	5169 W Yarrow Road	POCATELLO	83201	TMP286882	CR LIGHTING & ELECTRIC INC	Cathy Cashmore	CR LIGHTING & ELECTRIC INC	C:035239	12400	284	FINALED	10/27/2020	1/22/2021



Division of Building Safety

1090 E Watertower St. Suite 150
 Meridian ID, 83642
 1-800-955-3044 phone
 1-877-810-2840 fax

Applied Date: 10/27/2020
Entered By: ECO
Permit No.: WEB2010-05164
License No.: C:035239

Site Address:	5169 W Yarrow Road	Parcel No.	TMP286882
City:	POCATELLO	Default Inspector:	NATHAN AVERY 986-218-0572
Contractor:	CR LIGHTING & ELECTRIC INC	Description of Work:	
Address:	2463 N Hillfield Rd Layton UT 84041	Roof Top Solar Array	
Phone:	(801) 510-6379		
Owner:	Cathy Cashmore	Directions to Location:	
Address:	5169 W Yarrow Road Pocatello ID 83201		
Phone:	(208) 390-3961		

FEES

Fee Description	Amount	Receipt #	Paid Date
COMMERCIAL/INDUSTRIAL/SOLAR/OTHER	\$284.00	WEB370615	10/27/2020

TOTAL FEES	\$284.00
TOTAL FEES PAID	\$284.00
TOTAL FEES DUE	\$0.00

This is your ELECTRICAL Permit and Receipt

WEB2010-05164

**** Permit Fees are Non-Refundable and Non-Transferable ****

EXPIRATION OF PERMITS: This permit will expire one (1) year after the applied date of the permit or one (1) year after the last documented inspection. If your permit has expired and has been expired for less than a year, you may reactivate the permit for an additional year by contacting the Division of Building Safety and paying a reactivation fee

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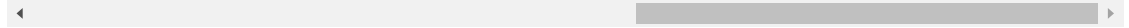
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Contractor Name	Contractor License #	Job Value	Permit Fee	Permit Status	Issued Date	Expiration Date
CR LIGHTING & ELECTRIC INC	035239	12400	284	FINALED	10/27/2020	01/22/2021



[First](#)

[Prev](#)

Page: 1 of 1

[Next](#)

[Last](#)

Details - Permit# WEB2010-05164

[Permit](#)

[Permit Info](#) | [Site Info](#) | [Fees \\$284.00](#) | [Inspections \(2\)](#) | [Reviews \(4\)](#)

Type	Reviewer	Status	Submitted	Completed	Due Date	
Electrical	Daryl Nelson	RESUBMI...	10/29/2020	11/6/2020		More Info
Electrical	Daryl Nelson	RESUBMI...	11/12/2020	11/23/2020		More Info
Electrical	Daryl Nelson	RESUBMI...	11/30/2020	12/10/2020		More Info
Electrical	Daryl Nelson	APPROV...	12/14/2020	12/23/2020		More Info

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Electrical Plans Examiner's Report

Date: November 6, 2020

Project Name: WEB2010-05164 SOLAR-Cashmore

Project Description: 3.1 KW DC Grid Tied Solar PV System Addition to an Existing ???? KW DC PV System

Project Address: 5169 W Yarrow Rd Pocatello

RESUBMITTAL REQUIRED

Findings: (Issues that need to be resolved prior to the plans and documentation being approved) All electrical equipment, devices, and installations shall be governed by the 2017 National Electrical Code and local codes as they are adopted within the State of Idaho.

Not all the necessary documentation, drawings, and/or information was provided to verify compliance with, and/or the submitted documentation, drawings, and/or information provided does not comply with the 2017 NEC as adopted by the State of Idaho. See the following:

The submitted plans and/or documentation does not contain all the information necessary for a plan's inspection. Plans and documents shall meet the Submittal Requirements that can be found in the "Submittal Information" folder, accessible through Project Dox. Please provide detailed information on the existing system.

The disconnect and conductors for Point of Connection in accordance with NEC 705.12 (A) shall have a rating in accordance of NEC 230.79 (D) or rated in accordance with NEC 240.4 (B) and 705.60, whichever is greater. The disconnecting means shall be installed in accordance with NEC 705.20 through 705.31. (see the following link for your information.)

https://www.ul.com/sites/g/files/qbfbp251/files/2019-05/UL_SellSheets_LineSideBreaker18_vPRINT2.pdf

The submitted documentation does not appear to have all the required manufacture's specification sheet/s to verify compliance with the applicable 2017 NEC codes as adopted by the State of Idaho. Please see the Submittal Requirements can be found in the "Submittal Information" folder, accessible through Project Dox. (Number 4 on the Submittal Requirements)

- Enphase Combiner

As more documentation and/or information is provided there may be additional Findings that will be required to be addressed.

Electrical Plans Examiner's Report

Date: November 23, 2020

Project Name: WEB2010-05164 SOLAR-Cashmore

Project Description: 3.1 KW DC Grid Tied Solar PV System Addition to an Existing ???? KW DC PV System

Project Address: 5169 W Yarrow Rd Pocatello

RESUBMITTAL REQUIRED

Findings: (Issues that need to be resolved prior to the plans and documentation being approved) All electrical equipment, devices, and installations shall be governed by the 2017 National Electrical Code and local codes as they are adopted within the State of Idaho.

Not all the necessary documentation, drawings, and/or information was provided to verify compliance with, and/or the submitted documentation, drawings, and/or information provided does not comply with the 2017 NEC as adopted by the State of Idaho. See the following:

This Electrical Plans Inspection is based upon the latest submitted documentation and drawings.

The submitted documentation and drawings do not appear to address the previous Findings. See the previous Electrical Plans Examiner's Report.

From the submittal requirements:

3) Electrical One-Line Diagram - To verify compliance with the 2017 National Electrical Code; a detailed and legible Electrical One-Line Diagram on a white background shall denote the electrical, renewable energy, power production/generating, and/or energy storage system/s and **their associated components** as they are to be installed **to include existing** associated electrical, renewable energy, power production/generating, and/or energy storage system/s as follows:

Electrical Plans Examiner's Report

Date: December 10, 2020

Project Name: WEB2010-05164 SOLAR-Cashmore

Project Description: 3.1 KW DC Grid Tied Solar PV System Addition to an Existing ???? KW DC PV System

Project Address: 5169 W Yarrow Rd Pocatello

RESUBMITTAL REQUIRED

Findings: (Issues that need to be resolved prior to the plans and documentation being approved) All electrical equipment, devices, and installations shall be governed by the 2017 National Electrical Code and local codes as they are adopted within the State of Idaho.

Not all the necessary documentation, drawings, and/or information was provided to verify compliance with, and/or the submitted documentation, drawings, and/or information provided does not comply with the 2017 NEC as adopted by the State of Idaho. See the following:

This Electrical Plans Inspection is based upon the latest submitted documentation and drawings.

The submitted documentation and drawings do not appear to address the previous Findings. See the previous Electrical Plans Examiner's Report.

Electrical Plans Examiner's Report

Date: December 23, 2020

Project Name: WEB2010-05164 SOLAR-Cashmore

Project Description: 3.1 KW DC Grid Tied Solar PV System Addition to an Existing 8.12 KW DC PV System

Project Address: 5169 W Yarrow Rd Pocatello

APPROVED WITH CONDITIONS

Notes: *(Issues that can be resolved or verified at the time of inspections.) All electrical equipment, devices, and installations shall be governed by the 2017 National Electrical Code and local codes as they are adopted within the State of Idaho.*

***** Building Permits and Inspections are not covered by the Electrical Permit. *****

The stamped documentation has been Reviewed for Compliance in accordance with the NEC as adopted by the State of Idaho by an Electrical Plans Inspection. This shall not be construed as an approval of any violation of, or variance from Idaho's adopted codes, standards, laws, or rules. Final approval will be based upon on-site electrical inspections to field verify compliance.

All labels, plaques, signage, their type, size, and content shall be field verified by on-site electrical inspections for compliance with the 2017 NEC as adopted by the State of Idaho. The required labels, plaques, and signage shall not cover or obscure other labels, plaques, and signage. (Applicable codes 690.13 (B), 690.31 (G) (3) & (4), 690.53, 690.54, 690.55, 690.56, 705.10, 705.12 (B) (2) (3) (b) and/or (c), 705.12 (B) (3), 705.80, 706.11, 710.15 (C), and other 2017 NEC codes as applicable.)

The one-line indicates a Point of connection in accordance with NEC 705.12 (A). The disconnect and conductors for Point of Connection shall have a rating in accordance of NEC 230.79 (D) or rated in accordance with NEC 240.4 (B) and 705.60, whichever is greater. The disconnecting means shall be installed in accordance with NEC 705.20 through 705.31.

Please have photos of the Existing installed Solar Panels and Microinverters available for the on-site inspector.

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Contractor Name	Contractor License #	Job Value	Permit Fee	Permit Status	Issued Date	Expiration Date
CR LIGHTING & ELECTRIC INC	035239	12400	284	FINALED	10/27/2020	01/22/2021

[First](#)

[Prev](#)

Page: 1 of 1

[Next](#)

[Last](#)

Details - Permit# WEB2010-05164

[Permit](#)

[Permit Info](#) | [Site Info](#) | [Fees \\$284.00](#) | [Inspections \(2\)](#) | [Reviews \(4\)](#)

Type	Result	Scheduled Date	Time	Completed	Time	
**ELE-FINAL	PASS	1/22/2021		1/22/2021		More Info
ELE-ENERGIZE SERVICE	PASS	1/22/2021		1/22/2021		More Info

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Permit Number	Permit Type	Site Address	Site City	Site Zip Code	Site Parcel Number	Applicant Name
WEB2010-05164	ELECTRICAL	5169 W Yarrow Road	POCATELLO	83201	TMP286882	CR LIGHTING

 Page: 1 of 1

Details - Permit# WEB2010-05164

Permit

Inspection - **ELE-FINAL

Permit Info	Site Info	Fees \$284.00	Inspections (2)	Reviews (4)	
					Inspection Type: **ELE-FINAL Order#: 0 Result: PASS Scheduled Date: 1/22/2021 Scheduled Time: Completed Date: 1/22/2021 Completed Time: Inspector: GINO ENDO Remarks: see notes Notes: (1/22/2021 5:05 PM GEN) Already on with existing system for over a year. Pass
Type	Result	Scheduled Date			
**ELE-FINAL	PASS	1/22/2021			
ELE-ENERGIZE SERVICE	PASS	1/22/2021			

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Screenshots of Inspection Notes, Permit # WEB2010-05164

Obtained from Idaho Division of Building Safety Website, accessed Mar. 28, 2023

Permit Search available at: [eTRAKIT \(idaho.gov\)](http://eTRAKIT.idaho.gov)

Inspection - ELE-ENERGIZE SERVICE	
Inspection Type:	ELE-ENERGIZE SERVICE
Order#:	0
Result:	PASS
Scheduled Date:	1/22/2021
Scheduled Time:	
Completed Date:	1/22/2021
Completed Time:	
Inspector:	GINO ENDO
Remarks:	see notes
Notes:	<p>12/23/2020 9:55 AM CR LIGHTING & ELECTRIC INC solar final please call dallas @435-730-5805 Contact Name: CR LIGHTING & ELECTRIC INC Site Address: 5169 W Yarrow Road Phone: 8015106379 e-Mail: AMY.SIMMS@CRSOLARENERGY.COM</p> <p>(12/29/2020 4:55 PM GEN) Met with Dallas, showed me what was added, 10 panels, one stringer. Old system was Solar World 285 watt panels, and m250 micro inverters.</p> <p>(1/22/2021 5:03 PM GEN) Went back and looked at solar installation again, had one line of original system. Also I talked to Richard, the electrician who installed it. All of his stuff was in the basement, and was ran in emt all the way to the garage, down, and out to AC disconnect. Was no room for 2 pole breaker in existing combiner, so CR added his own in garage, passed outside to his own AC disconnect, then went into the existing conduit</p> <p>down to the 200 amp sub in the basement for a grid tie just above the original 40 amp breaker in the bottom left side. Not installed according to plan and review, but I think it will be ok. Ok to energize, pass</p>

[CLOSE](#)