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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER IDAHO POWER)	
COMPANY’S APPLICATION FOR)	CASE NO. IPC-E-23-14
AUTHORITY TO IMPLEMENT)	
CHANGES TO THE COMPENSATION)	INITIAL COMMENTS
STRUCTURE APPLICABLE TO)	
CUSTOMER ON-SITE GENERATION)	IDAHO CONSERVATION LEAGUE
UNDER SCHEDULES 6, 8, AND 84 AND)	
TO ESTABLISH AN EXPORT CREDIT)	
METHODOLOGY)	

Comments

COMES NOW the Idaho Conservation League (“ICL”), and through counsel, submits these initial comments to the Idaho Public Utilities Commission (“Commission”) regarding Idaho Power Company’s (“IPC” or “Company”) application in the above captioned matter. ICL recognizes the imperative to decarbonize the whole energy system as rapidly as feasible, and supports distributed solar and other energy resources (“DER”) as key components of a renewable-centric grid. To this end, ICL participated in each phase of Idaho Power’s efforts to alter customer generation offerings and the forgoing dockets before the Commission. We welcome resolution on the matter, and urge the Commission and Company to consider these comments and those of other intervening parties and the public in designing an equitable and durable distributed energy program.

We initially recommend that the Commission:

1. Adjust the Company's Export Credit Rate ("ECR") methodology to include marginal line loss calculations and avoided cost figures based on battery storage as the alternative dispatchable resource.
2. Afford customer generators necessary stability by authorizing an update period longer than the Company's proposed one year.
3. Provide for a transitional rate for net metering customers.
4. Afford the full financial value of unused Export Credits to customers rolling over into the next annual billing period.
5. Approve the Company's request to lift and alter the project eligibility cap for residential, commercial, and irrigation customer self generators.

In addition to these recommendations we raise concerns of considering this docket concurrently with Idaho Power's general rate case, IPC-E-23-11. As detailed in the Company's Application¹ and the direct testimony of Connie Aschenbrenner² matters affecting net metering schedules are divided between this docket and the general rate case. Broadly, this docket considers export matters, while the rate case addresses consumption rates and cost allocation. And while this regulatory division is formally correct, concurrently filing these dockets has confused customers and complicated analysis in each matter. The effect of running the two dockets together is like a multivariate equation: movement one inherently informs a response in the other. The core public policy concerns and motivation to bring this docket are the affordability of distributed

¹ Application at 2.

² Aschenbrenner, DI at 20.

generation and cost shifting between customer classes. Both directly depend on the financial and policy outcomes of the rate case.

At the time of these comments, the Company, Staff, and Intervenor Parties to the general rate case have reached a settlement in principle.³ The proposed settlement has not been fully drafted, delivered to or approved by the Commission, and remains confidential.⁴ While the matters in this docket are formally distinct from those in the rate case and an unapproved settlement remains unenforceable, the practical effect of considering this docket now is that some parties have access to confidential information affecting Schedules 6, 8, and 84 while others and the public do not.

We stop short of recommending an altered schedule in this docket, though it may become necessary as fairness dictates as each docket resolves. Instead, we urge Parties and the Commission to be mindful of the informational and procedural imbalances arising out of concurrent consideration of this docket and the rate case. While parties may have the technical and informational capacity to jointly assess these dockets, such analysis and bill estimation is a tall order for customers and interested businesses. We welcome the Commission's decision to extend the public comment period to November 8; this does much to help customers' inclusion.⁵ Still, while we are hopeful settlement in the rate case will resolve smoothly, that process may fall through and will, as scheduled, not be resolved by the Commission before then.⁶ Until then, analysis in this case and prospective bill impacts are moving targets.

³ IPC-E-23-11, Order Vacating Testimony Deadlines, Order No. 35954; ICL is an intervening party in the Company's rate case, Order No. 35850.

⁴ Commission Rule 272. ICL and intervenors in this docket Micron, Inc., Clean Energy Opportunities for Idaho, IIPA, City of Boise, and Idahydro are also parties to the rate case, IPC-E-23-11. The remaining intervenor Vote Solar is not a party.

⁵ IPC-E-23-11, Notice of Public Comment Deadline, Order No. 35955.

⁶ IPC-E-23-11, Notice of Schedule, Order No.35873. Technical hearings in the rate case are scheduled beginning November 29, continuing as needed.

Indeed, reaching resolution on the Company's customer generation offerings has been lengthy. The preceding scoping⁷ and study⁸ dockets afforded the topic due thoroughness and detail, but not without a year's each of time invested. We are sensitive to existing and prospective distributed energy customers with interest in speedy resolution and certainty around Schedules 6, 8, and 84. Many hope to resolve these matters expeditiously to better assess the viability of pending projects and secure financial incentives. Appropriate process and resolution remains, as always, in balance.

ICL respectfully submits these recommendations and comments to Staff, Parties, and the Commission. We appreciate all efforts and contributions to reach this point and welcome continued dialogue in this process.

DATED this 12th Day of October, 2023.

Respectfully submitted,

/s/ Matthew A. Nykiel
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⁷ IPC-E-21-21.

⁸ IPC-E-22-22.

CERTIFICATE OF SERVICE

I hereby certify that on this 12th Day of October, 2023, I delivered true and correct copies of the foregoing COMMENTS to the following persons via the method of service noted:

/s/ Matthew A. Nykiel
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