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May 30, 2024

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

Re: Tariff Advice No. IPC-TAE-24-01

Modifications to Schedule 62 - Clean Energy Your Way Program - Optional

Dear Commission Secretary,

Pursuant to RP 134.01 (IDAPA 31.01.01.134.01), Idaho Power Company ("Idaho Power" or "Company") hereby submits its request to modify Schedule 62, Clean Energy Your Way Program (Optional) ("Schedule 62"). The Company has identified a definition change is warranted to ensure the Company's operational practices align with its tariff. The following tariff sheet identifies the proposed modification:

First Revised Sheet No. 62-1 Cancelling Original Sheet No. 62-1

The Clean Energy Your Way ("CEYW") Flexible offering provides participants an opportunity to participate in the purchase of environmentally friendly "green" energy – in the form of RECs – under one of three options. The definition of Renewable Energy Certificates ("RECs") contained within Schedule 62 dictates that the source of the REC will be from renewable projects (1) as defined by the Center for Resource Solutions Green-e Energy standard and will be (2) located in the Western Electricity Coordinating Council's ("WECC") geographic area of authority, with preference given to projects located in Idaho Power's service area and the northwest. It further outlines the type of projects that may be considered qualifying renewable sources.

The definition of RECs was proposed by the Company in its application filed in Case No. IPC-E-16-13. In that case, the Company sought to update the Green Power Program's¹ pricing structure, clarify REC sourcing and certification, and obtain Commission approval to modify certain elements of program funding. While at the time reflective of best industry practices, Idaho Power has found the definition of RECs to be overly prescriptive. Recently, a REC shortage in the WECC region has led the Company to seek options beyond the WECC to provide continued availability of renewable energy to participants in the CEYW Flexible offering.

¹ Prior to August 15, 2023, Schedule 62 was titled Schedule 62 Green Energy Purchase Program Rider (Optional). In Order No. 35893 (issued in Case No. IPC-E-21-40), the Commission approved the CEYW Program nomenclature.

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With this filing, Idaho Power seeks an administrative update to the REC definition that will align with expected operational and procurement practices regarding the geographical sourcing of RECs. Further, the Company proposes to clarify that eligible RECs for the CEYW Flexible option do not need to be "Green-e® certified," a specific and detailed certification process only conducted by the Center for Resource Solutions. Rather, RECs are also eligible for Idaho Power's Flexible option if they are registered within a renewable energy certificate tracking system, such as WREGIS (the Western Renewable Energy Generation Information System), a less administratively burdensome registration system that ensures RECs are not double counted by any individual, group, or company. Please note that the proposed change is administrative in nature and does not impact any programmatic or pricing aspect of the CEYW program or the Flexible offering.

The Company respectfully requests that the proposed update is approved and become effective by July 8, 2024.

If you have any questions regarding this tariff advice, please contact me at 208-388-2872 or awilliams@idahopower.com.

Sincerely,

Alison Williams

Xhjo Well

AW:sg Enclosures

cc: Connie Aschenbrenner, Idaho Power; Terri Carlock, IPUC Staff

I.P.U.C. No. 30, Tariff No. 101

SCHEDULE 62 CLEAN ENERGY YOUR WAY PROGRAM (OPTIONAL)

PURPOSE

The Clean Energy Your Way Program (the Program) is an optional, voluntary program designed to provide eligible Customers and non-customer participants an opportunity to participate in the purchase of environmentally friendly "green" energy. The Program contains two offerings: 1) The Clean Energy Your Way – Flexible for Customers and non-customers wishing to procure RECs from existing resources which may or may not be on Idaho Power's system; and 2) the Clean Energy Your Way – Construction option for Customers interested in new renewable energy resources.

DEFINITIONS

<u>Excess Generation</u> is calculated on an hourly basis and represents the REF energy delivered to Idaho Power's system that exceeds the REF On-Site Usage.

<u>Net Consumption</u> is calculated on an hourly basis and represents the Customer(s) metered kWh usage less the line loss-adjusted REF energy delivered to Idaho Power's system. The Net Consumption cannot be less than zero.

Renewable Construction Agreement will be the contractual agreement developed between Idaho Power and a Customer(s) governing the terms, conditions, and pricing of a Clean Energy Your Way – Construction arrangement.

Renewable Energy Certificate (RECs) will be from renewable projects registered within a renewable energy certificate tracking system or as defined by the Center for Resource Solutions Green-e Energy standard.

Renewable Energy Facilities (REFs) are resources fueled by solar, wind, biomass, geothermal, or hydropower. REFs must be located within Idaho Power's service area or connected to Idaho Power's transmission system and represent new facilities (i.e. facilities not previously constructed). A Seller's Generation Facility (as defined by Schedule 72) is ineligible to be selected as a REF.

<u>REF Cost</u> will reflect the cost of the resource interconnected to Idaho Power's system and procured on behalf of the participating Customer(s).

REF Credit will reflect the benefit of the REF to Idaho Power's system, subject to Commission approval.

<u>REF On-Site Usage</u> is calculated on an hourly basis and represents the amount of line loss-adjusted energy generated by the REF up to a Customer(s) metered kWh usage.

I.P.U.C. No. 30, Tariff No. 101Second RevisedOriginal Sheet No. 62-1

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Renewable Energy Certificate (RECs) will be from renewable projects registered within a renewable energy certificate tracking system or as defined by the Center for Resource Solutions Green-e Energy standard—and renewable energy will be sourced from projects located in the Western Electricity Coordinating Council's geographic area of authority with preference given to projects located in Idaho Power's service area and the northwest. Renewable energy types will be primarily wind and solar but may include other certified types such as geothermal, low-impact hydroelectric, landfill gas, and biomass.

Renewable Energy Facilities (REFs) are resources fueled by solar, wind, biomass, geothermal, or hydropower. REFs must be located within Idaho Power's service area or connected to Idaho Power's transmission system and represent new facilities (i.e. facilities not previously constructed). A Seller's Generation Facility (as defined by Schedule 72) is ineligible to be selected as a REF.

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