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**VIA ELECTRONIC FILING**

June 17, 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-24-02  
Revisions to Schedule 84, Large General, Large Power, and  
Irrigation On-Site Generation

Dear Commission Secretary:

Idaho Power Company's ("Idaho Power" or "Company") hereby submits a proposed administrative update to Schedule 84, Large General, Large Power, and Irrigation On-Site Generation ("Schedule 84").

On May 1, 2023, Idaho Power submitted an application in Case No. IPC-E-23-14 requesting the Commission, in part, approve a modified project eligibility cap for commercial, industrial, and irrigation ("CI&I") customers applying to take service under Schedule 84. More specifically, the Company requested that the Schedule 84 project eligibility cap be set at the greater of 100 kW or 100 percent of demand at the service point for CI&I customers.

The Company's application (as modified by the Company's revised proposal filed on November 16, 2023) was approved by the Commission on December 29, 2023, through Order No. 36048. On December 29, 2023, January 10, 2024, and January 12, 2024, the Company filed tariff revisions for the Commission's review and acceptance in IPC-E-23-14 in conformance with Order No. 36048. On January 23, 2024, the Commission issued Order No. 36067 approving the Company's tariff schedules.

As Idaho Power has gained experience administering the modified project eligibility cap for Schedule 84, it has come to the Company's attention that, as currently written, the tariff language addressing how a Schedule 84 customer's demand is determined for purposes of conforming to the 100 percent eligibility cap is ambiguous. Specifically, after describing in paragraph 5(b)(ii) the cap as the greater of "the greatest monthly Billing Demand established during the most recent 12-month period at the time of applying for interconnection, which includes and ends with the most recent Billing Period," or 100 kW, paragraph 6 lists methods for determining demand in instances where a customer seeks

to interconnect a system that either (1) has a nameplate capacity rating that exceeds actual billing demand or (2) billing demand data is unavailable. The language in paragraph 6 was initially proposed by the Company in its January 10, 2024, compliance filing and was intended to clarify how the project eligibility cap would be administered in instances where historical demand was not reflective of expected future demand and/or where there was no historical demand (e.g., a plant expansion or a new service point). However, the Company understands that, as currently written, this provision has been interpreted to mean that a Schedule 24 customer could apply to interconnect a system that is the “greater of” either the historical demand or a conversion factor applied to the nameplate horsepower of their irrigation system’s motor – even in instances of where historical billing demand exists. That interpretation is not consistent with the record established in IPC-E-23-14, nor does the Company believe it reflects the intent of Commission Order No. 36048.

Accordingly, the Company submits this tariff advice to ensure the tariff language is reflective of the Commission’s decision in Order No. 36048. The following tariff sheet identifies the proposed modifications:

First Revised Sheet No. 84-2      Cancelling      Original Sheet No. 84-2

Idaho Power respectfully requests the proposed updates be accepted, with an effective date of July 17, 2024.

If you have any questions regarding this filing, please contact Regulatory Analyst Ashley Herrera at (208) 388-2656 or [aherrera@idahopower.com](mailto:aherrera@idahopower.com).

Very truly yours,



Connie Aschenbrenner  
Rate Design Senior Manager

CGA:sg  
Enclosures

SCHEDULE 84  
LARGE GENERAL, LARGE POWER, AND IRRIGATION  
ON-SITE GENERATION SERVICE

(Continued)

APPLICABILITY (Continued)

ii. Single-Meter Interconnection (applicable to new applicants effective December 2, 2020): Owns and/or operates a Generation Facility interconnected to the Customer's individual electric system on the Customer's side of the Point of Delivery, thus all energy received and delivered by the Company is through a single meter.

6. The Generation Facility must have a total nameplate rating equal to or less than the greater of: (a) the greatest monthly Billing Demand established during the most recent 12-month period at the time of applying for interconnection, which includes and ends with the most recent Billing Period, or (b) 100 kW. The capacity of an Energy Storage Device shall not be used to calculate the capacity limits in this schedule.

a. Subject to the Company's discretion and approval, for a Customer applying to interconnect a Generation Facility (1) where Billing Demand is not available, or (2) where the Billing Demand is not reflective of future operations, the customer may provide evidence that the proposed Generation Facility meets the applicability of this schedule in accordance with one of the following:

i. If previous billing data is available for the premises and the Customer's electrical needs are similar to the previous customer, the Company may rely on available historical Billing Demand at the premises not to exceed the previous 12 months.

ii. If the Customer has another account in the Company's service area with similar electrical needs, the Company may rely on available historical Billing Demand from that account not to exceed the previous 12 months.

iii. The Customer can have a third-party professional engineer provide analysis and documentation detailing the electrical load requirements for the Customer which support an increase in demand expected to occur within the next 12 months.

iv. For a Customer taking retail service under Schedule 24, the Customer may submit documentation of the horsepower ("HP") of the irrigation equipment (motors and/or pumps). Based on the submitted documentation the Company will determine the maximum continuous HP and a conversion factor of 1 HP to 0.8kW will be used to define the demand for the Point of Delivery.

7. Legacy Status for eligible Exporting Systems will terminate on December 1, 2045.

8. The Legacy Status of the Exporting System is transferable to a subsequent Customer at the premises for which a valid on-site generation service is in effect. Each Customer of a Legacy System taking service under Schedule 84 will be responsible for complying with the terms and conditions of the on-site generation service in effect for that premises.

9. A Legacy System that is offline for over six (6) months or that is moved to a different site shall forfeit Legacy Status of the Exporting System.

SCHEDULE 84  
LARGE GENERAL, LARGE POWER, AND IRRIGATION  
ON-SITE GENERATION SERVICE

(Continued)

APPLICABILITY (Continued)

ii. Single-Meter Interconnection (applicable to new applicants effective December 2, 2020): Owns and/or operates a Generation Facility interconnected to the Customer's individual electric system on the Customer's side of the Point of Delivery, thus all energy received and delivered by the Company is through a single meter.

6. The Generation Facility must have a total nameplate rating equal to or less than the greater of: (a) the greatest monthly Billing Demand established during the most recent 12-month period at the time of applying for interconnection, which includes and ends with the most recent Billing Period, or (b) 100 kW. The capacity of an Energy Storage Device shall not be used to calculate the capacity limits in this schedule.

6a. ~~Subject to the Company's discretion and approval, F~~for a Customer applying to interconnect a Generation Facility (1) where Billing Demand is not available, or (2) where the Billing Demand is not reflective of future operations, the customer may provide evidence with a total nameplate capacity rating that exceeds actual billing demand data from the most recent 12 months, or (2) Billing Demand is not available, must provide evidence that the proposed Generation Facility meets the applicability of this schedule in accordance with one of the following:

i. If previous billing data is available for the premises and the Customer's electrical needs are similar to the previous customer, the Company ~~, at its discretion,~~ may rely on available historical Billing Demand at the premises not to exceed the previous 12 months.

ii. If the Customer has another account in the Company's service area with similar electrical needs, the Company ~~, at its discretion,~~ may rely on available historical Billing Demand from that account not to exceed the previous 12 months.

iii. The Customer can have a third-party professional engineer provide analysis and documentation detailing the electrical load requirements for the Customer which support an increase in demand expected to occur within the next 12 months.

iv. For a Customer taking retail service under Schedule 24, ~~which only services motor load,~~ the Customer may submit documentation of the horsepower ("HP") of the irrigation equipment (motors and/or pumps). motor/pump to Based on the submitted documentation the Company will determine the maximum continuous HP and a conversion factor of 1 HP to 0.8kW will be used to define the demand for the Point of Delivery.

7. Legacy Status for eligible Exporting Systems will terminate on December 1, 2045.

8. The Legacy Status of the Exporting System is transferable to a subsequent Customer at the premises for which a valid on-site generation service is in effect. Each Customer of a Legacy System

taking service under Schedule 84 will be responsible for complying with the terms and conditions of the on-site generation service in effect for that premises.

9. A Legacy System that is offline for over six (6) months or that is moved to a different site shall forfeit Legacy Status of the Exporting System.