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IDAHO PUBLIC  
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

<b>IN THE MATTER OF THE</b>	)	
<b>APPLICATION OF ROCKY</b>	)	<b>CASE NO. PAC-E-19-08</b>
<b>MOUNTAIN POWER TO CLOSE THE</b>	)	
<b>NET METERING PROGRAM TO</b>	)	
<b>NEW SERVICE &amp; IMPLEMENT A</b>	)	<b>IDAHO CONSERVATION LEAGUE</b>
<b>NET BILLING PROGRAM TO</b>	)	
<b>COMPENSATE CUSTOMER</b>	)	<b>REVISED INITIAL COMMENT ON</b>
<b>GENERATORS FOR EXPORTED</b>	)	<b>STUDY DESIGN</b>
<b>GENERATION</b>	)	

The Commission, in Order No. 34661, provided an opportunity for parties to file Revised Initial Comments that incorporate public feedback gathered through a PUC Staff hosted workshop and Commission hosted public hearing. After reviewing the public input provided in those forums, as well as the written public comment filed since Rocky Mountain Power’s Supplemental Application, the Idaho Conservation League (ICL) stands by our initial comments. The public input thus far bolsters our position that Rocky Mountain Power’s proposal is inadequate in at least three regards. RMP’s analysis lacks supporting data and instead relies on questionable assumptions. RMP inappropriately compares the value of remote, utility-scale solar with local customer-owned resources and thereby creates substantial customer confusion. And RMP’s proposal for legacy rate treatment does not adequately respect the interests of current net metering program participants. ICL notes the public input thus far unanimously opposes RMP’s proposals. Accordingly, ICL stands by our initial comments.

The public comments raised an additional issue that ICL did not address in our initial comments – the treatment of a net metering customer’s unused energy credits. ICL joins the public comments that strongly oppose RMP’s proposal to extinguish unused credits annually without compensation. A customer who exports excess provides energy to RMP the Company then uses to serve, for compensation, neighboring demand. The export customer carries a credit on their account that represents value to them for providing this product to the utility. If the Commission were to empower RMP to extinguish this value without compensation, that would raise a host of legal and equity issues. The far fairer, just, and reasonable approach is to allow customers to carry credits indefinitely and allow customers to transfer credits to other meters in a manner akin to the meter aggregation rules applied to Idaho Power. ICL also strongly supports the idea raised in Mr. Robert Sorensen’s Comment of April 30, 2020 where he reports asking RMP to donate the value of his extra energy credits to some other customer who is unable to pay their bill. We applaud Mr. Sorensen’s compassionate idea and urge the Commission to make clear that no formal rule prohibits RMP from implementing this opportunity.

ICL recognizes that accounting for customer credits may cause accounting headaches for RMP. But the solution is for RMP to address these accounting issues and not for RMP to ask the Commission for the power to extinguish customer value without compensation. Thus, ICL recommends as part of the legacy rate treatment, the Commission reject RMP’s proposal to extinguish credits annually and instead continue to allow customers to carry credits forward, create a process by which customers can transfer credits to other meters, and implement the ability for a customer to donate their unused value to other customers who need bill assistance.

Respectfully submitted this 2nd day of July 2020.

/s/Benjamin J. Otto  
Idaho Conservation League

**CERTIFICATE OF SERVICE**

I certify that on the 2nd day of July 2020, I delivered true and correct copies of the foregoing REVISED INITIAL COMMENTS to the following via the service method noted:

/s/ Benjamin J. Otto  
Idaho Conservation League

Electronic Mail only (Order No 34602)

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