



PUBLIC WORKSHOP



APPLICATION FOR ITS FIRST ANNUAL UPDATE
TO THE EXPORT CREDIT RATE FOR NON-
LEGACY ON-SITE GENERATION CUSTOMERS
FROM JUNE 1, 2025 THROUGH MAY 31, 2026,
IN COMPLIANCE WITH ORDER NO. 36048, Case
No. IPC-E-25-15
“ECR Update”

IDAHO PUBLIC UTILITIES COMMISSION

May 7th, 2025, 6:00 PM (MDT)

Workshop Participation



- Online:
 - To open chat in WebEx, please select the icon.
 - Type questions and comments in the chat box;
 - Please use the “Everyone” option when using chat to ensure your message will be seen.
 - To speak, click on the hand icon in the lower section of your Webex screen. I will send you an invitation to unmute your audio line.
- On The Phone:
 - *3 is the command to raise and lower your hand;
I will send you an invite to un-mute your line. Please press *6 to un-mute your line on your end.

Workshop Participation

- After your questions have been answered:
 - Please press *3 to lower your hand and press *6 to mute your line if you're on the phone.
 - Please mute your line and lower your hand if participating online.
 - At the conclusion of the presentation, we'll answer questions from the in-person attendees first. Once those questions have been answered, we will take questions from online attendees.
- To ensure as many questions as possible are answered:
 - Please listen carefully to questions and answers. We hope to avoid duplicate questions and respond to questions on individual subjects.

This PowerPoint is available on the commission's homepage at puc.idaho.gov.

Introductions

Jason Talford

Technical Analyst

Matt Suess

Engineer

Jolene Bossard

Utilities Compliance
Investigator

Purpose of Public Workshop

- **Informational session to**
 - Overview the IPUC and its role.
 - Describe the related case history.
 - Describe the case process.
 - Present Idaho Power Company's application.
 - Explain how to submit written comments.
 - Provide an opportunity to ask questions on the application.
- **This Public Workshop is not part of the official case record.**

What is the Idaho Public Utilities Commission?

- Established in 1913. Idaho Code Sections 61 and 62.
- The Commission regulates Idaho's investor-owned utilities, ensuring adequate service and reasonable rates.
- The Commission is made up of three commissioners appointed by the Governor and confirmed by the Senate. The Commissioners make the decisions in each case.
- Commission Staff ("Staff") is made up of Auditors, Consumer Compliance Investigators, Engineers, Technical Analysts, and Admin.
- Staff is conducting this workshop. Staff is one of the Parties in the case and providing comments to the Commissioners.

Progression of the Case

Application

- State law requires that the Commission consider all evidence that is on the record, which includes the Idaho Power Company's supporting documentation, Comments from Staff & Parties, and customers' written comments and oral testimony at public customer hearings.

Staff's Role

- Staff reviews and analyzes the Company's filing and proposals
- Staff provides recommendations to the Commission based on its analysis.

Final Order

- The Commission will review all evidence and have authority to issue a final order.*

*All Commission decisions must withstand Idaho Supreme Court Appeals from either utility or customer groups



Case History

Purpose of On-Site Generation

- “the Commission maintains that the fundamental purpose of on-site generation is to offset a customer’s own usage”
 - Order No. 26750, 1995
 - Order No. 28951, 2001
 - Order No. 30227, 2006
 - Order No. 36048, 2023

Case No. IPC-E-17-13

- Established Schedule 6: Residential Service On-Site Generation and Schedule 8: Small General Service On-Site Generation
- **Commission Order No. 34046**
 - Ordered the Company to study the costs and benefits of on-site generation, as well as the proper rates and rate design for excess energy.

Case No. IPC-E-21-21

- Study design phase: incorporating public feedback and concerns through public workshops and public comments on the record.
- Commission Order No. 35284:
 - Individually approved each component of study
 - Found that the Company is best positioned to study the specifics of Idaho powers system.
 - Found that the Study Framework meet Commission directive for a credible and fair study.
 - Directed Company to complete study.

Case No. IPC-E-22-22

- The Study is available for public review.
 - Value of Distributed Energy Resources (“VODER”)
 - www.puc.idaho.gov (Case Number: IPC-E-22-22)
- **Commission Order No. 35631:**
 - “IT IS FURTHER ORDERED that the Company shall file a new case requesting to implement changes to the structure and design of its NEM program”

Case No. IPC-E-23-14

- Established net billing structure for non-legacy customers, set initial ECR, and established mechanism to update ECR components annually
- Commission Order No. 36048:
 - Individually approved each component of the ECR.
 - “The Company shall update all proposed components of the ECR except the season and hours of highest risk in an annual filing beginning April 1, 2025.”
 - Updates are formulaic



Application

IPC-E-25-15 Schedule

Event	Date
Case Filed	04/01/2025
Public Workshop	05/07/2025 6:00 p.m.
Written Public Comments	Open until 05/15/2025
Public Customer Hearing	05/20/2025 4:00 p.m.
Staff/intervenor Comments	05/15/2025
Company Reply Comments	05/22/2025
Close of Case/ Final Order	TBD
Proposed Effective Date	Proposed June 1 st , 2025

The Company's Requests

1. An order from the Commission authorizing Idaho Power to implement the updated ECR for non-legacy on-site generation customers from June 1, 2025 through May 31, 2026 of

14.5980¢ per kWh for summer on-peak

1.76820¢ per kWh for summer-off peak

0.95400¢ per kWh for the non-summer season

2. An effective date of June 1, 2025.



Explaining the ECR Calculation

Understanding the ECR

ECR

=

**Avoided
Energy Value**

+

**Avoided
Capacity Value**

Includes:

Avoided Energy
Line Losses
Integration Costs

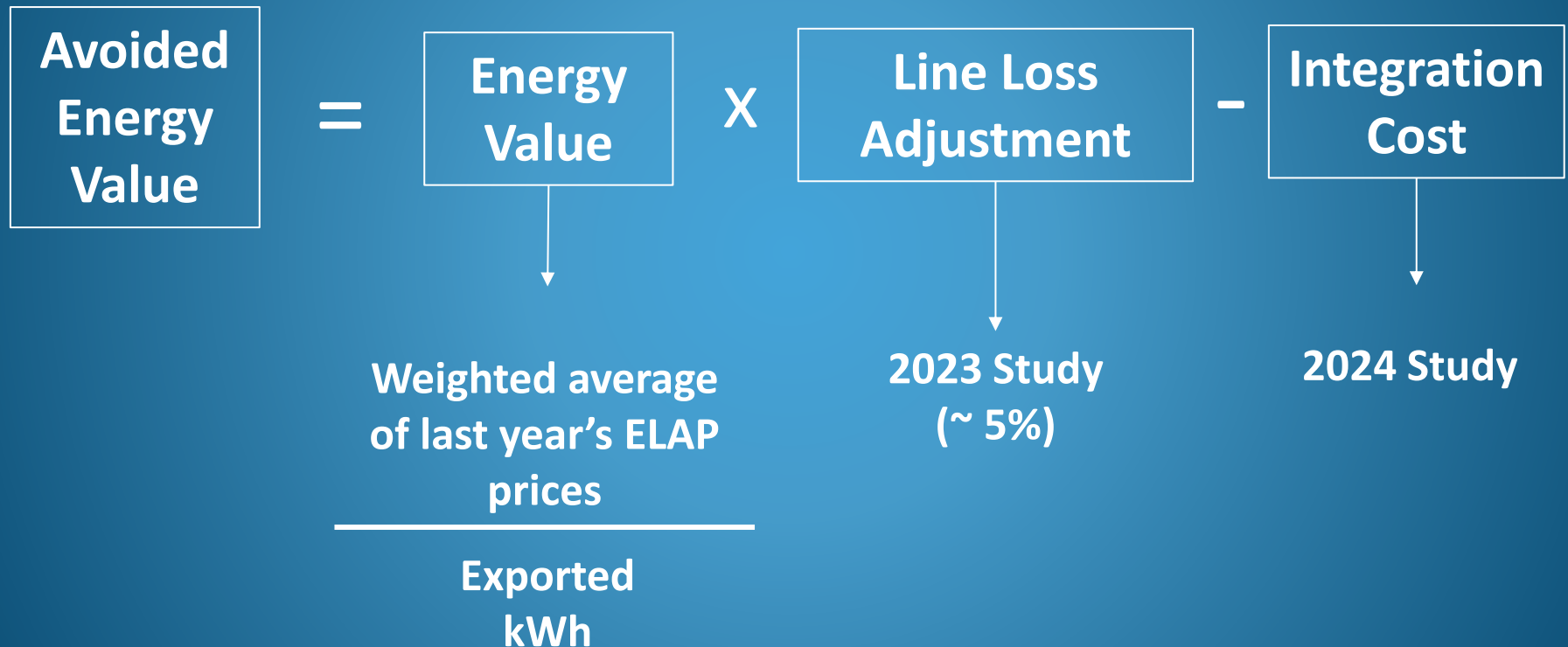
Includes:

Avoided Generation Capacity
Avoided T&D Capacity
Line Losses

This value is added
to all exports.
It went DOWN
from 5.2¢ to 1.3¢

This value only occurs during
On-Peak hours, so it is only
applied to On-Peak exports.
It went UP
from 11.8¢ to 12.3¢

Avoided *Energy* Value



*ELAP = Energy Imbalance Market Load Aggregation Point

Change in the Cost of Energy

2022 Energy Value

Month	Value	Energy	\$/MWh
1	\$ 102,879	3,144	\$ 32.72
2	\$ 167,545	6,362	\$ 26.33
3	\$ 233,461	8,973	\$ 26.02
4	\$ 436,204	9,977	\$ 43.72
5	\$ 445,602	11,077	\$ 40.23
6	\$ 320,466	10,728	\$ 29.87
7	\$ 574,323	8,850	\$ 64.90
8	\$ 567,746	7,962	\$ 71.30
9	\$ 592,657	8,543	\$ 69.37
10	\$ 516,061	9,157	\$ 56.36
11	\$ 332,075	4,809	\$ 69.06
12	\$ 517,249	2,494	\$ 207.40
			\$ 4,806,268
			92,076
			\$ 52.20
			\$ 2,055,192
			36,084
			\$ 56.96
			\$ 2,751,076
			55,993
			\$ 49.13

2024 Energy Value

Month	Value	Energy	\$/MWh
1	\$ 245,051	3,913	\$ 62.63
2	\$ 136,706	7,016	\$ 19.49
3	\$ 141,922	12,802	\$ 11.09
4	\$ 31,692	18,703	\$ 1.69
5	\$ (12,752)	20,240	\$ (0.63)
6	\$ 270,382	17,346	\$ 15.59
7	\$ 416,881	13,686	\$ 30.46
8	\$ 361,978	14,319	\$ 25.28
9	\$ 351,963	13,988	\$ 25.16
10	\$ 434,150	12,701	\$ 34.18
11	\$ 241,687	6,853	\$ 35.27
12	\$ 150,126	4,311	\$ 34.82
			\$ 2,769,787
			145,879
			\$ 18.99
			\$ 1,401,205
			59,339
			\$ 23.61
			\$ 1,368,582
			86,539
			\$ 15.81

Change in the Cost of Energy

2024 Energy Value

Avoided Energy Calculation	Summer Update	Non-Summer Update
ELAP - Weighted Average	\$ 23.61	\$ 15.81
Plus: Line Loss Gross-up	\$ 1.04	\$ 0.70
Less: Integration Costs	\$ (6.97)	\$ (6.97)
Avoided Energy Value	\$ 17.68	\$ 9.54

The Company's Proposed ECR

<u>Export Credit Rate by Component (cents/kWh)</u>		current	proposed
Energy <i>Including integration and losses</i>	Summer	5.6533 ¢	1.7682 ¢
	Non-Summer	4.8365 ¢	0.9540 ¢
	<i>Annual*</i>	5.1566 ¢	1.2852 ¢
Generation Capacity	On-Peak	11.5862 ¢	11.9017 ¢
	Off-Peak	0.0000 ¢	0.0000 ¢
	<i>Annual*</i>	0.7871 ¢	1.1360 ¢
Transmission & Distribution Capacity	On-Peak	0.2456 ¢	0.3899 ¢
	Off-Peak	0.0000 ¢	0.0000 ¢
	<i>Annual*</i>	0.0167 ¢	0.0372 ¢
Total	Summer On-Peak	17.4850 ¢	14.0598 ¢
	Summer Off-Peak	5.6533 ¢	1.7682 ¢
	Non-Summer	4.8365 ¢	0.9540 ¢
	<i>Annual*</i>	5.9603 ¢	2.4585 ¢



Billing Impact

Average Monthly Bill Impact

Rate Schedule	Current ECR	Proposed ECR
Schedule 6 – Residential	\$62.35	\$83.62
Schedule 8 - Small General Service	\$23.53	\$49.02
Schedule 84 - Large Commercial and Industrial	\$656.01	\$735.41
Schedule 84 - Irrigation	\$1,203.5	\$1,412.43

Individual bill total charge driven by actual consumption and exports.

Does not include PCA, FCA, rider surcharge/credit.



Consumer Assistance

Jolene Bossard

Utilities Compliance Investigator

Consumer Assistance

- Utility Compliance Investigators assist customers to resolve issues and/or disputes with the Company.
- Investigators monitor compliance with laws, commission rules, and the Company tariff.
- Represent consumer interests when staff is developing a position in a case
- In a rate case, investigators review issues from previous cases, review previous complaints, review submitted comments from customers, and investigate consumer issues raised in the case.

Consumer Issues

As of this week, the PUC has received 646 Customer Comments

- Majority against the proposal
- Unfair compensation compared to rates charged
- Customers penalized for generating clean energy
- Proposal discourages the transition to more renewable energy
- Multiple rate changes in a short amount of time
- Increases to the Customer Charge
- Requests for virtual Customer Public Hearings
- ECR will be adjusted every year

Customer Comments

Customer written comments are due **May 15, 2025**
(Reference Case Number **IPC-E-25-15**)

- Internet Website Address – puc.idaho.gov
- Online - Case Comment Form (once comments are submitted, they become part of public record)
- Email – Address: secretary@puc.idaho.gov
- Mail – IPUC, PO Box 83720, Boise, ID 83720-0074
- Public Customer Hearing – **May 20, 2025**

COMMENTS ONLY
(QUESTIONS WILL NOT BE ADDRESSED)

Idaho Public Utilities Homepage

The screenshot shows the homepage of the Idaho Public Utilities Commission. At the top, the logo reads "IDAHO PUBLIC UTILITIES COMMISSION" with "ENHANCED BY Google" on the right. A navigation bar includes links for Home, Cases, File Room, Laws & Rules, Consumers, Press Releases, About us, and Contact us. A left-hand menu lists various utility categories: Case Comment Form (highlighted with a yellow arrow), Annual Gross Intrastate Revenues Report Form, Electric, Telecom, Water, Natural Gas, Rail Safety, Pipeline Safety, Multi-Utility, and Tariff Advice. On the right, a "News Updates" section lists several presentations and workshops, with a red arrow pointing to its scrollbar. Below this is a "Wildfire Safety Resources" section with a warning icon and a link to an "eFile Portal". A note states that utility representatives can use their passcode to file electronically. At the bottom left, a "Consumers" section lists links for Consumer Complaint / Inquiry Form, Frequently Asked Questions, Consumer Resources, and Why Can't You Tell Them No.

Home Cases ▾ File Room ▾ Laws & Rules ▾ Consumers ▾ Press Releases About us ▾ Contact us ▾

- Case Comment Form
- Annual Gross Intrastate Revenues Report Form
- Electric
- Telecom
- Water
- Natural Gas
- Rail Safety
- Pipeline Safety
- Multi-Utility
- Tariff Advice

News Updates

- Rocky Mountain Power Technical Hearing - Jan. 9
- Rocky Mountain Power General Rate Case PowerPoint Presentation - Sept. 25
- IPC-E-24-22 PowerPoint Presentation - Sept. 17
- Idaho Power Rate Case PowerPoint - Sept. 5
- Idaho Power Rate Case Video Presentation - Sept. 5
- CDS Stoneridge Video Presentation
- CDS Stoneridge Workshop Presentation - June 4

Wildfire Safety Resources

Utility representatives may use their passcode to electronically file.

[eFile Portal](#)

Use the [eFile Portal Registration Form](#) if you are a representative of a utility and need a passcode to submit documents.

Consumers

- [Consumer Complaint / Inquiry Form](#)
- [Frequently Asked Questions](#)
- [Consumer Resources](#)
- [Why Can't You Tell Them No](#)

Comments Form Page

[Home](#) [Cases](#) [File Room](#) [Laws & Rules](#) [Consumers](#) [Press Releases](#) [About us](#) [Contact us](#)

Case Comment or Question Form

Use this form to **file a comment or ask a question about a utility case** pending before the Commission. If you know the case number, please include it.

Submit electronically below or send in to:

Idaho Public Utilities Commission
P O Box 83720
Boise, Idaho 83720-0074
FAX: (208) 334-3762

Use the [Consumer Complaint / Inquiry Form](#) if you need help resolving a problem with a utility or have a question about your bill, disconnection of service, service reliability and outages, cost of a line extension, customer service, or other issues that are not related to a utility case.

Case Comment Form

Use this form to file a comment or ask a question about a case

Case Number:

First Name:

Last Name:

Address:

City:

State:

Zip:

Daytime Phone:

Email:

Utility Company:

I am interested in attending an online workshop or potentially an in-person workshop. Yes, I am interested. No thanks.

I am interested in attending a customer hearing to give testimony (verbal comments) for the record on this case. Yes, I am interested. No thanks.

I acknowledge that submitting a comment in an open case constitutes a public record under Idaho Code § 74-101 (13) and all information provided by me on this form is available for public and media inspection. My comment may be reviewed by the utility.

Ask a question or state your comment:



PUC Home Page



Home Cases ▾ File Room ▾ Laws & Rules ▾ Consumers ▾ Press Releases About us ▾ Contact us ▾

- Case Comment Form**
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Electric Page

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Electric

- Cases**
 - Open Cases 
 - Closed Cases
- Orders & Notices**
 - Commission Order No. 36390 - Interest Rate on Consumer Deposits
 - Commission Order No. 36545 - Utility Regulatory Fees
- Rules**
 - IPUC Rules
 - Safety and Accident Reporting Rules
- Avoided Cost Rates**
 - Avista Avoided Cost Rates For New Contracts
 - Avista Avoided Cost Rates For Renewal Contracts
 - Idaho Power Company Avoided Cost Rates For New Contracts
 - Idaho Power Company Avoided Cost Rates For
- Forms For Electric Utilities**
 - FERC Electric Industry Forms
- Resources**
 - Northwest Power Generation
 - Annual Average Rates for All States
 - Annual Average Rate by Customer Class
 - National Action Plan for Energy Efficiency
 - NARUC Committee on Electricity
 - Office of Energy Resources
 - Western Interstate Energy Board (WIEB)
 - DOE Energy Conservation Information
- Advanced Search**
 - Search cases, orders, resources, etc
- Electric Companies**
 - Avista
 - Idaho Power
 - Rocky Mountain Power

Open Electric Cases Page

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IPUC Open Electric Cases

Search: For:

<u>CaseNo</u>	<u>Company</u>	<u>Description</u>
AVU-E-24-13	AVISTA UTILITIES, INC	AVISTA -- 2025 ELECTRIC INTEGRATED RESOURCE PLAN (IRP)
AVU-E-25-01	AVISTA UTILITIES, INC	AVISTA -- GENERAL RATE CASE
AVU-E-25-02	AVISTA UTILITIES, INC	AVISTA -- COMPLIANCE FILING TO UPDATE AND ESTABLISH ITS CAPACITY DEFICIENCY PERIOD TO BE USED FOR AVOIDED COST CALCULATIONS
IPC-E-25-13	IDAHO POWER COMPANY	IDAHO POWER COMPANY -- APPLICATION FOR AUTHORITY TO INCREASE ITS RATES FOR ELECTRIC SERVICE TO RECOVER COSTS ASSOCIATED WITH THE HELLS CANYON COMPLEX RELICENSING PROJECT
IPC-E-25-14	IDAHO POWER COMPANY	IDAHO POWER COMPANY -- APPLICATION FOR AN ACCOUNTING ORDER FOR THE INCREMENTAL DISTRIBUTION UNDERGROUNDING COSTS OF THE NEW 138 KV TRANSMISSION LINE IN THE WOOD RIVER VALLEY
IPC-E-25-15	IDAHO POWER COMPANY	IDAHO POWER COMPANY -- APPLICATION FOR ITS FIRST ANNUAL UPDATE TO THE EXPORT CREDIT RATE FOR NON-LEGACY ON-SITE GENERATION CUSTOMERS FROM JUNE 1, 2025 THROUGH MAY 31, 2026, IN COMPLIANCE WITH ORDER NO. 36048
IPC-E-25-16	IDAHO POWER COMPANY	IDAHO POWER COMPANY -- APPLICATION FOR GENERAL RATE CASE

Case Summary Page

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IDAHO PUBLIC UTILITIES COMMISSION

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Case Summary

Last Updated	Case Number	Date Filed	Case Type	Status	Description
04/02/2025	IPC-E-25-15	04/01/2025	Application	Notice Received	IDAHO POWER COMPANY -- APPLICATION FOR ITS FIRST ANNUAL UPDATE TO THE EXPORT CREDIT RATE FOR NON-LEGACY ON-SITE GENERATION CUSTOMERS FROM JUNE 1, 2025 THROUGH MAY 31, 2026, IN COMPLIANCE WITH ORDER NO. 36048

Case Files

04/01/2025 [APPLICATION.PDF](#)

Public Comments

04/04/2025 [COMMENTS_4.PDF](#)
04/07/2025 [COMMENTS_33.PDF](#)
04/08/2025 [COMMENTS_9.PDF](#)
04/09/2025 [COMMENTS_35.PDF](#)
04/10/2025 [COMMENT_1.PDF](#)
04/10/2025 [COMMENTS_21.PDF](#)
04/11/2025 [COMMENTS_78.PDF](#)
04/14/2025 [COMMENTS_112.PDF](#)



Where do we go from here?

- Customers can subscribe to the Commission's RSS feed to receive updates about all water cases via email.
- Continue submitting your comments.
- Public Customer Hearing, date is **May 20, 2025**.
- The Commission will issue a final order which will close the case.



You can find case information and file comments on the PUC website:

puc.idaho.gov

Case Number IPC-E-25-15

Direct: (208) 334-0300

Toll-Free: (800) 432-0369

Fax: (208) 334-3762



Questions?

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Value of Distributed Energy Resources ("VODER") Study

- Start of 6-year process to determine proper rates and rate design of exported energy.
- Ordered by the Commission, designed with input from the public, stakeholders, Staff, and the Company.
- Uses transparent and publicly available data and calculations.
 - Order No. 34046, 2017
 - Order No. 35284, 2021
 - Order No. 35631, 2022

Recovery of Export Credit Expenditures

- “ECR expenditures shall be recovered as a NPSE subject to 100% recovery through the PCA” Order No. 36048
- Power Cost Adjustment (“PCA”) is a mechanism that reflects the cost of energy.
- 100% recovery means the Company gets no profit; all expense is passed to rate payers.
- Accurate ECR creates downward pressure on rates for all customers.

Grandfathering

- Not within the scope of this Case
- Established in 2019 by Order No. 34509
- “First, an existing customer is 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 [12/20/2019], 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. [12/20/2020]”
- “After the issuance of this Order, however, 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.”

Commission Language on Tariffs

- “In prior orders [the Commission] notified customers that tariffs are not contracts, and that prices and terms of service are subject to change.”
 - Order No. 30227, 2006
 - Order No. 34046, 2017
 - Order No. 34509, 2018
 - Order No. 34335, 2019
 - Order No. 34892, 2020
 - Order No. 36048, 2023

RESIDENTIAL SOLAR ENERGY SYSTEM DISCLOSURE ACT (added 2019)

TITLE 48, Chapter 18

- Idaho statute states that solar retailers are required to provide a disclosure statement with any solar agreement that must include the following language :
- 1805(2)(c)(i) "THIS IS AN ESTIMATE. UTILITY RATES MAY GO UP OR DOWN AND ACTUAL SAVINGS, IF ANY, MAY VARY. HISTORICAL DATA IS NOT NECESSARILY REPRESENTATIVE OF FUTURE RESULTS. FOR FURTHER INFORMATION REGARDING RATES, CONTACT YOUR LOCAL UTILITY OR THE IDAHO PUBLIC UTILITIES COMMISSION."
- 1805(3) "LEGISLATIVE OR REGULATORY ACTION MAY AFFECT OR ELIMINATE YOUR ABILITY TO SELL OR GET CREDIT FOR ANY EXCESS POWER GENERATED BY THE SYSTEM AND MAY AFFECT THE PRICE OR VALUE OF THAT POWER."