PUBLIC WORKSHOP

ROCKY MOUNTAIN POWER'S APPLICATION FOR AUTHORITY TO IMPLEMENT CHANGES TO NON-LEGACY CUSTOMER GENERATORS

Case No. PAC-E-25-02

"ECR Filing"

IDAHO PUBLIC UTILITIES COMMISSION

July 15th, 2025, 6:00 PM (MDT)

July 16th, 2025, 12:00 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.

- We will address questions at the end of the presentation

This PowerPoint is available on the Commission’s homepage at puc.idaho.gov.

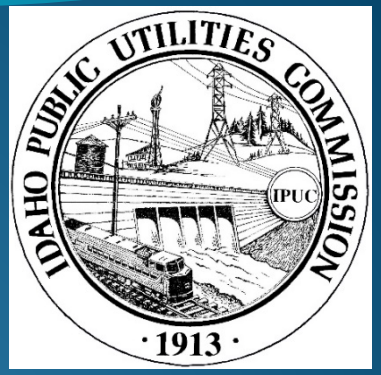
Introductions

Jason Talford	Technical Analyst
Michael Ott	Technical Analyst
Curtis Thaden	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 Rocky Mountain Powers' 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 Rocky Mountain Power'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

PAC-E-25-02 Schedule

Event	Date
Case Filed	02/07/2025
Virtual Public Workshop	**07/15/2025, 6:00 PM**
Virtual Public Workshop	**07/16/2025, 12:00 PM**
Written Public Comments	**Open until 08/14/2025**
Virtual Public Customer Hearing	**8/19/2025, 4:00 PM**
Staff/intervenor Comments	08/14/2025
Company Reply	09/03/2025
Close of Case	Final Order
Proposed Effective Date	10/01/2025

Application

Application

Filed February 7th, 2025

The Company Requests Approval of:

1. an export credit rate for customers on Schedule 136 beginning October 1, 2025
2. an increased cap for non-residential customers to 2,000 kW.
3. annual updates to the export credit rate
4. the updated Schedule 136 tariff incorporating the changes reflected in this application.

Requesting an effective date of October 1, 2025.

The Company's Reasons for Filing

- It was directed to file a proposal by the Commission (Order 35631)
- The existing system overvalues exports, which results in cost-shifting between participants and non-participants.
- To balance the interests of participants and non-participants.
- On-site generation customers need more clarity about the future rate structure.
- Need to modernize an outdated service offering.
- A long history of related cases….

Case History

Case No. PAC-E-03-04

- Established Schedule 135: Net Metering
- **Commission Order No. 29260, 2003**
  - "The net metering tariff proposed by the Company provides its customers with the opportunity to offset their electric loads and energy requirements. This opportunity to run the meter backwards and offset usage is the primary purpose of net metering"
  - "The Commission recognizes that the full cost of the program we approve today may not be borne only by participants"

Case No. PAC-E-19-08

- Original application proposed to close net metering and begin net billing with no change to rates.
- During this filing, the Commission issued Order No. 34509 in Case No. IPC-E-18-15.
  - Directing Idaho Power to conduct a study design and study review process
- Company and parties agreed to pivot case to align with study design phase of a cost benefit study.

Case No. PAC-E-19-08

- **Commission Order No. 34752 & 34798, 2020**
  - Close Schedule 135: Net Metering & outlined requirements for grandfathering.
  - Opened Schedule 136: Net Billing

- **Commission Order No. 34753, 2020**
  - Directed the Company to conduct a study of on-site generation designed input of all parties.

Case No. PAC-E-23-17

- Study review phase
- **Commission Order No. 36286, 2024**
  - Acknowledged compliance with Order No. 34753,
  - Directed Company to file case to propose its ECR changes.

Company's Proposals

Terms & Definitions

- Customer-generators: Customers who have a generation system (typically solar) capable of exporting energy to the grid.
- kWh: kilowatt-hour – A standard unit of energy. One kilowatt of power for one hour.
- Export Credit Rate ("ECR"): A monetary value for exported energy. Usually cents per kWh.
- Net Energy Metering ("NEM"): The Company's previous kWh-to-kWh program. Usually shortened to "Net Metering."
- Net Billing: The Company's current program that tracks exported and imported energy separately.
- Legacy / Grandfathered Systems: Systems that are eligible to remain in the Net Metering program by meeting criteria in Order 34752.

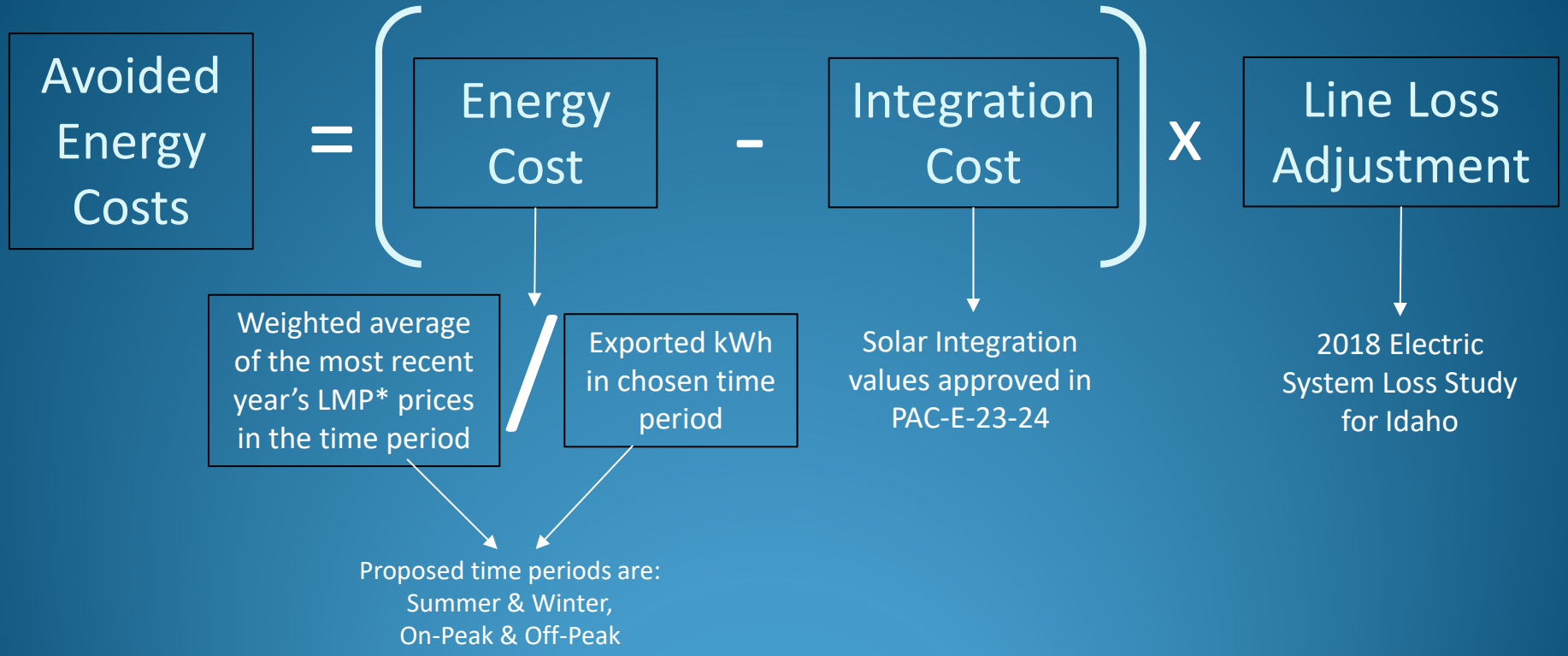
Understanding the ECR

ECR = Avoided Energy Costs + Avoided Capacity Costs

Includes:
Avoided Energy
Line Losses
Integration Costs

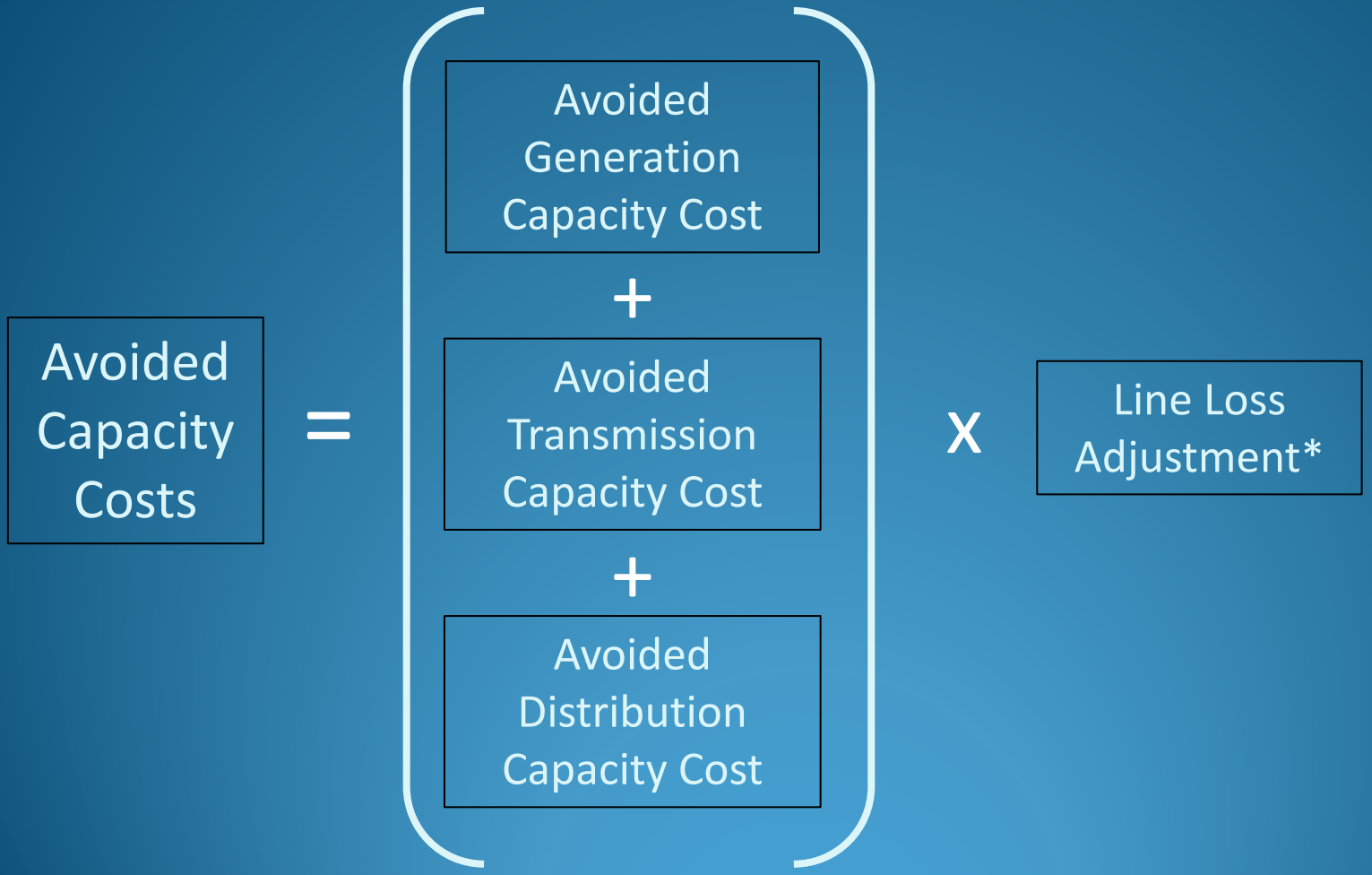
Includes:
Avoided Generation Capacity
Avoided Transmission Capacity
Avoided Distribution Capacity
Line Losses

Avoided ***Energy*** Costs



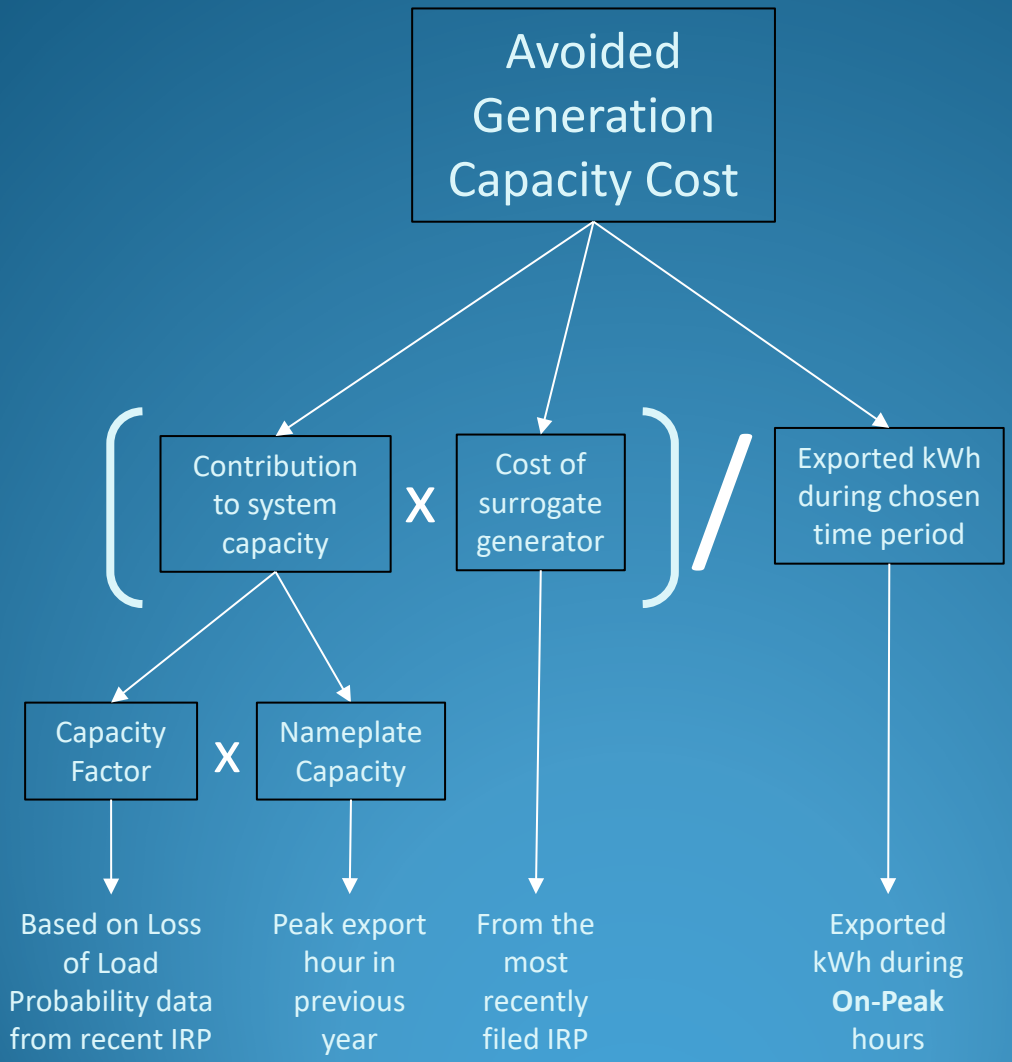
*LMP = Locational Marginal Prices. Average of the hourly prices at Meadow Creek and Oneida LMPs

Avoided ***Capacity*** Costs



*Line loss adjustment amount varies for each factor

Avoided ***Generation Capacity*** Costs



The Company's Proposed Hours

Summer (Jun – Oct)

On-Peak: 3pm-11pm (all days)

Off-Peak: 11pm-3pm (all days)

Winter (Nov – May)

On-Peak: 6am-9am and 6pm-11pm (all days)

Off-Peak: 9am-6pm and 11pm-6am (all days)

The Company's Proposed ECR

Table 1: Export Credit Summary

Export Profile	Annual	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak
Volume (kWh per kW)	949	119	329	35	466
Capacity Contribution (%)	10.97%	8.69%	1.97%	0.03%	0.28%
Value by Element (cents/kWh)					
Energy	2.415	4.007	3.063	2.934	1.513
- Integration	(0.385)	(0.638)	(0.488)	(0.467)	(0.241)
+ Avoided Line Losses	0.184	0.304	0.233	0.223	0.115
Generation Capacity	1.488	9.408	0.770	0.121	0.078
Transmission Capacity Deferral	0.069	0.437	0.036	0.006	0.004
Transmission System Cost	0.297	1.707	0.023	1.878	0.011
Distribution Capacity Deferral	0.162	1.023	0.084	0.013	0.008
Total	**4.230**	**16.248**	**3.721**	**4.708**	**1.489**

(i) Annual values for information only and reflect seasonal weighting from the historical period.

Corrected ECR

Table 1: Export Credit Summary

Export Profile	Annual	Summer On-Peak	Summer Off-Peak	Winter On-Peak	Winter Off-Peak
Volume (kWh per kW)	0	136	387	18	409
Capacity Contribution (%)	0.00%	8.69%	1.97%	0.03%	0.28%
Value by Element (cents/kWh)					
Energy	2.415	4.024	3.149	1.750	1.213
- Integration	(0.385)	(0.641)	(0.502)	(0.279)	(0.193)
+ Avoided Line Losses	0.184	0.306	0.239	0.133	0.092
Generation Capacity	1.488	8.212	0.655	0.240	0.089
Transmission Capacity Deferral	0.069	0.381	0.030	0.011	0.004
Transmission System Cost	0.297	1.490	0.020	3.716	0.013
Distribution Capacity Deferral	0.162	0.893	0.071	0.026	0.010
Total	**4.230**	**14.666**	**3.664**	**5.597**	**1.228**

(i) Annual values for information only and reflect seasonal weighting from the historical period.

Total - as filed	**4.230**	**16.248**	**3.721**	**4.708**	**1.489**
Delta	0.000	-1.582	-0.057	0.890	-0.261

October season corrected from winter to summer

To be filed in July
To be effective October

The Company's Proposed ECR Update Schedule

ECR Component	Update Basis
Energy Value	Weighted average of historical prices from prior calendar year. Export profile updated to prior calendar year.
Capacity Value	Capacity price and LOLP distribution from the most recently filed IRP. In between IRPs, only an adjustment for inflation will be applied. Export profile updated to prior calendar year.
T&D Deferral	Same as Capacity Value above.
Transmission System Costs	The most recent OATT formula transmission rate. Export profile and monthly load peak hours from prior year.
Line Losses	Line losses used in the most recently approved general rate case.
Integration Costs	Costs approved for use in standard Qualified Facility rates.

Project Eligibility Cap

- The Company proposes to increase the cap for non-residential customers from 100 kW to 2,000 kW
- Both residential and non-residential sectors have a cap on how large an on-site generation system can be.

Recovery of Export Credit Expenditures

- "The Company proposes to treat ECR expenditures as a Purchased Power Expense"
- Purchased power expense is the cost of making or acquiring energy (e.g. fuel costs, market purchases,…)
- Purchased Power Expenses are tracked in the Energy Cost Adjustment Mechanism ("ECAM") and would collected from all customers.
- Overstated ECR leads to higher rates for all customers

Billing Impact

Average Monthly Bill Impact

Residential Schedule 1*

Net Delivery (kWh) Range	Current Monthly Average Bill	Proposed Monthly Average Bill	Change $	Change %
0-500 kWh	$20.13	$59.27	$39.14	194.4%
501-1,000 kWh	$68.69	$113.03	$44.34	$64.6%
1,001-1,500 kWh	$129.51	$170.69	$41.17	31.8%
1,501 – 2,000 kWh	$187.35	$226.37	$39.02	20.8%
2,001+ kWh	$320.44	$352.50	$32.06	10.0%

Individual bill total charge driven by actual consumption and exports

*Based on uncorrected ECR

Average Monthly Bill Impact

Residential Schedule 36 - Time of Day*

Net Delivery (kWh) Range	Current Monthly Average Bill	Proposed Monthly Average Bill	Change $	Change %
0-500 kWh	$39.08	$62.00	$22.92	58.6%
501-1,000 kWh	$82.62	$104.41	$21.79	26.4%
1,001-1,500 kWh	$141.12	$162.40	$21.29	15.1%
1,501 – 2,000 kWh	$183.73	$204.73	$21.00	11.4%
2,001+ kWh	$258.80	$279.32	$20.52	7.9%

Individual bill total charge driven by actual consumption and exports

*Based on uncorrected ECR

Consumer Assistance

Curtis Thaden

Utilities Compliance Investigator

Consumer Assistance

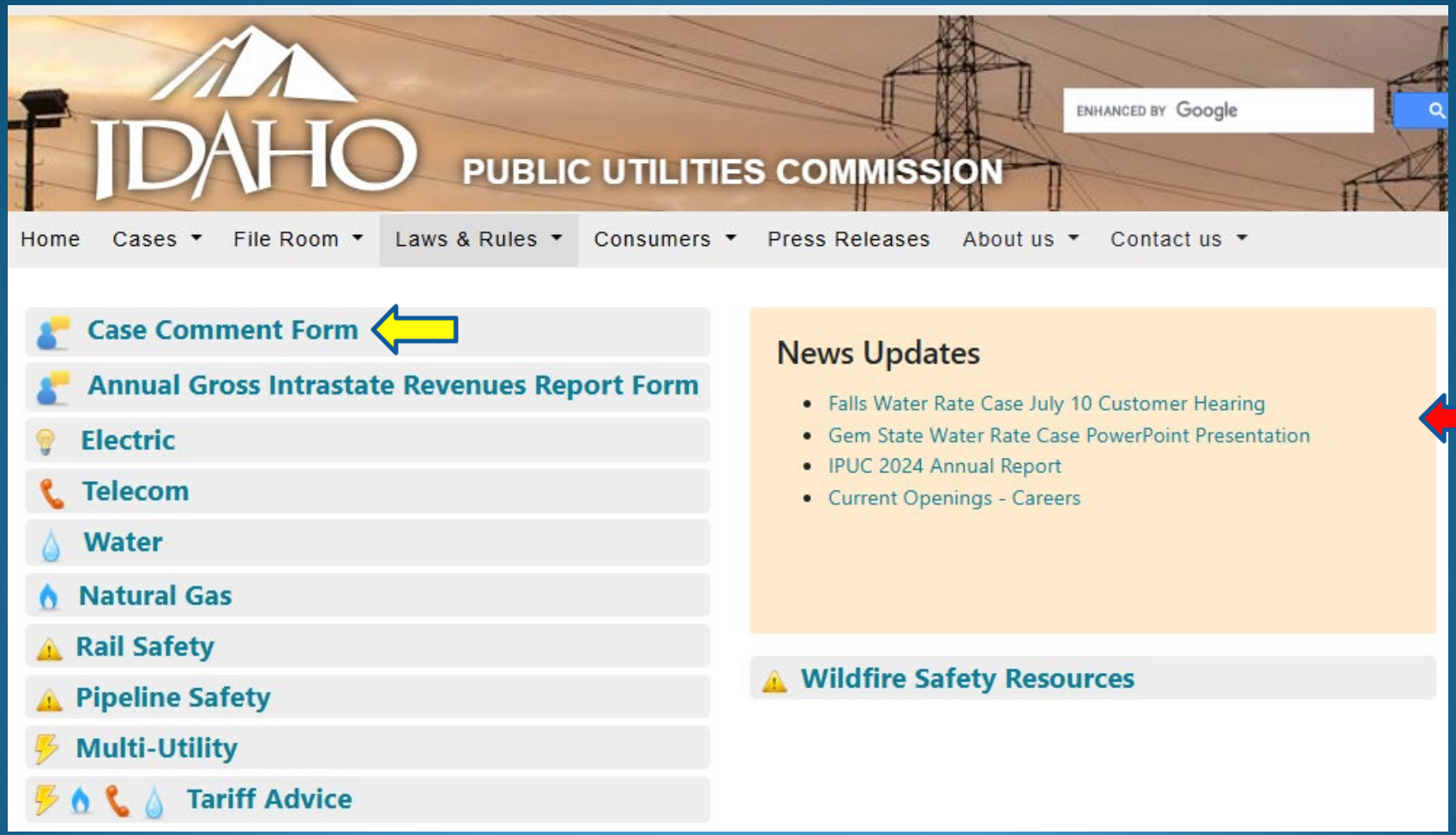
- Utility Compliance Investigators:
  - Assist customers to resolve issues and/or disputes with the Company.
  - Monitor compliance with laws, commission rules, and the Company tariff.
- In a case Investigators:
  - Represent consumer interests when staff is developing a position in a case.
  - Review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

CUSTOMER COMMENTS

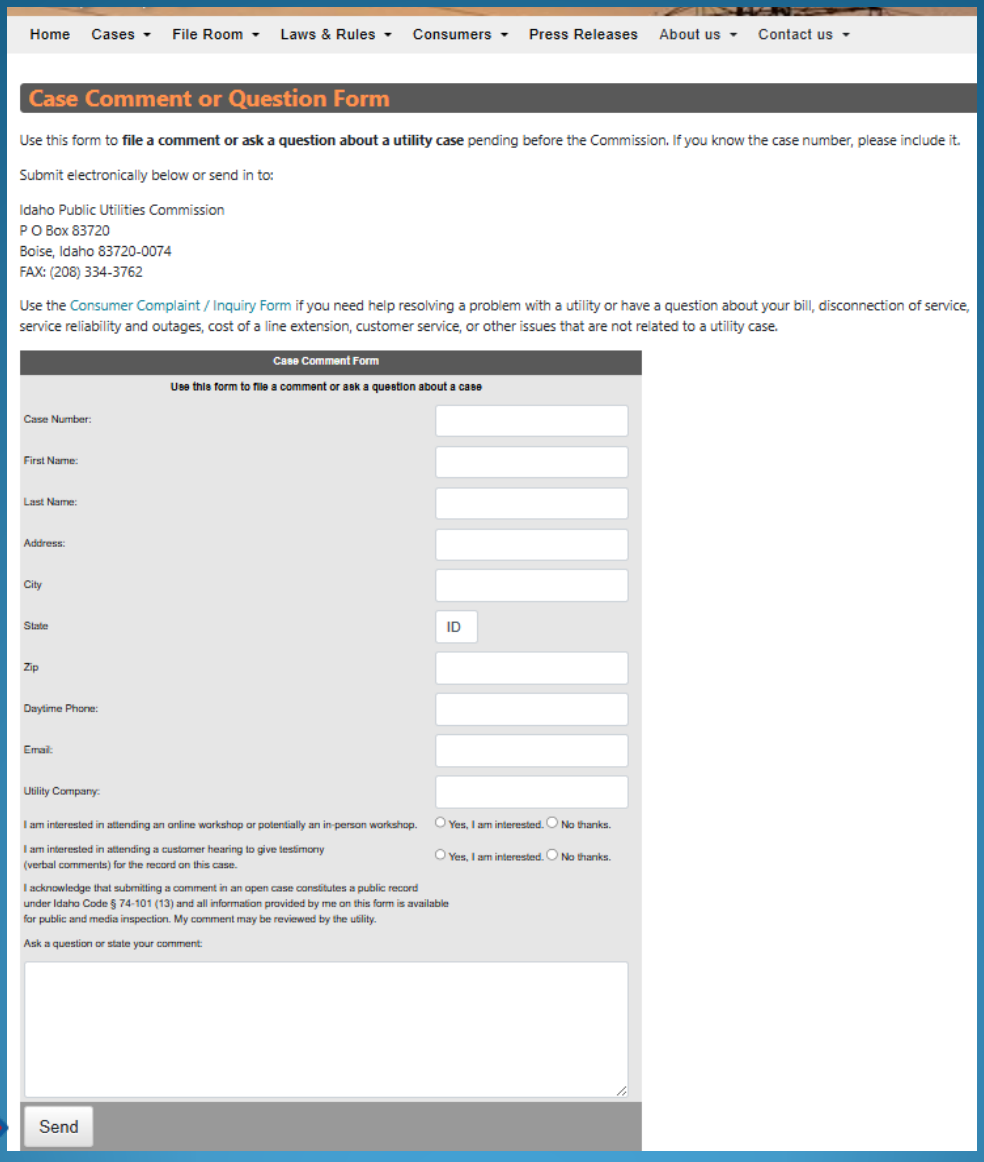
- As of this week, the PUC has received 145 customer comments
- Customer written comments are due August 14, 2025. (Reference Case Number PAC-E-25-02)
- Internet Website Address – puc.idaho.gov
- Select - Case Comment Form (once comments are submitted, they become part of public record)
- Email – Address: secretary@puc.idaho.gov
- Mail – IPUC, PO Box 83720, Boise, ID 83720-0074
  - Blank Customer Comments sheets are available here tonight to be mailed in or left with Staff.
- **Virtual** Public Customer Hearing – August 19, 2025

COMMENTS ONLY
(QUESTIONS WILL NOT BE ADDRESSED)

Idaho Public Utilities Homepage



Comments Form Page



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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.

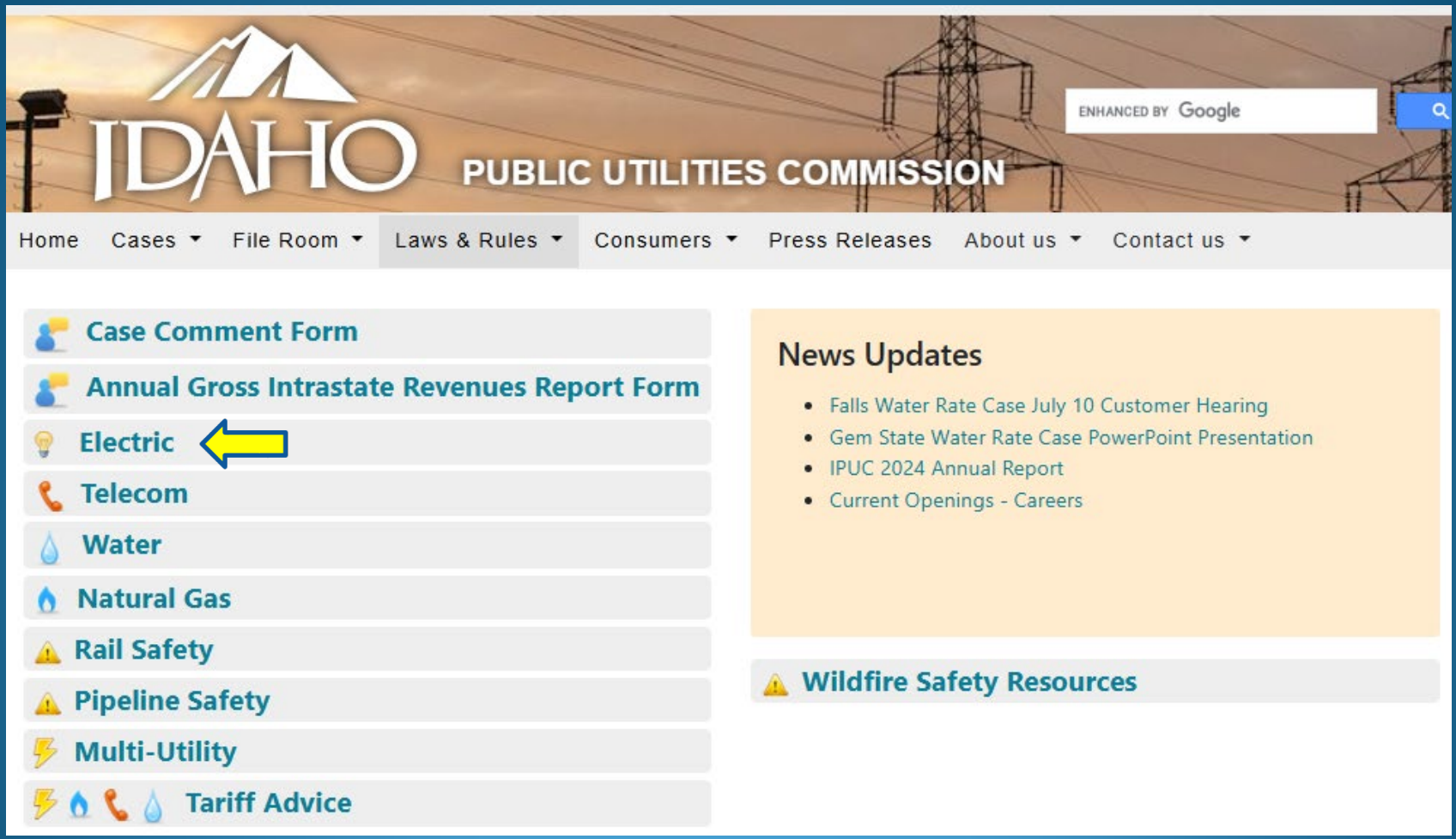
Case Comment Form

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

Case Number:
First Name:
Last Name:
Address:
City
State ID
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:

Send

PUC Home Page



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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)

Orders & Notices

Commission Order No. 35621 - Interest Rate on Consumer Deposits

Commission Order No. 35743 - Utility Regulatory Fees

Rules

IPUC Rules

Safety and Accident Reporting Rules

Avoided Cost Rates

Avista Avoided Cost Rates For New Contracts

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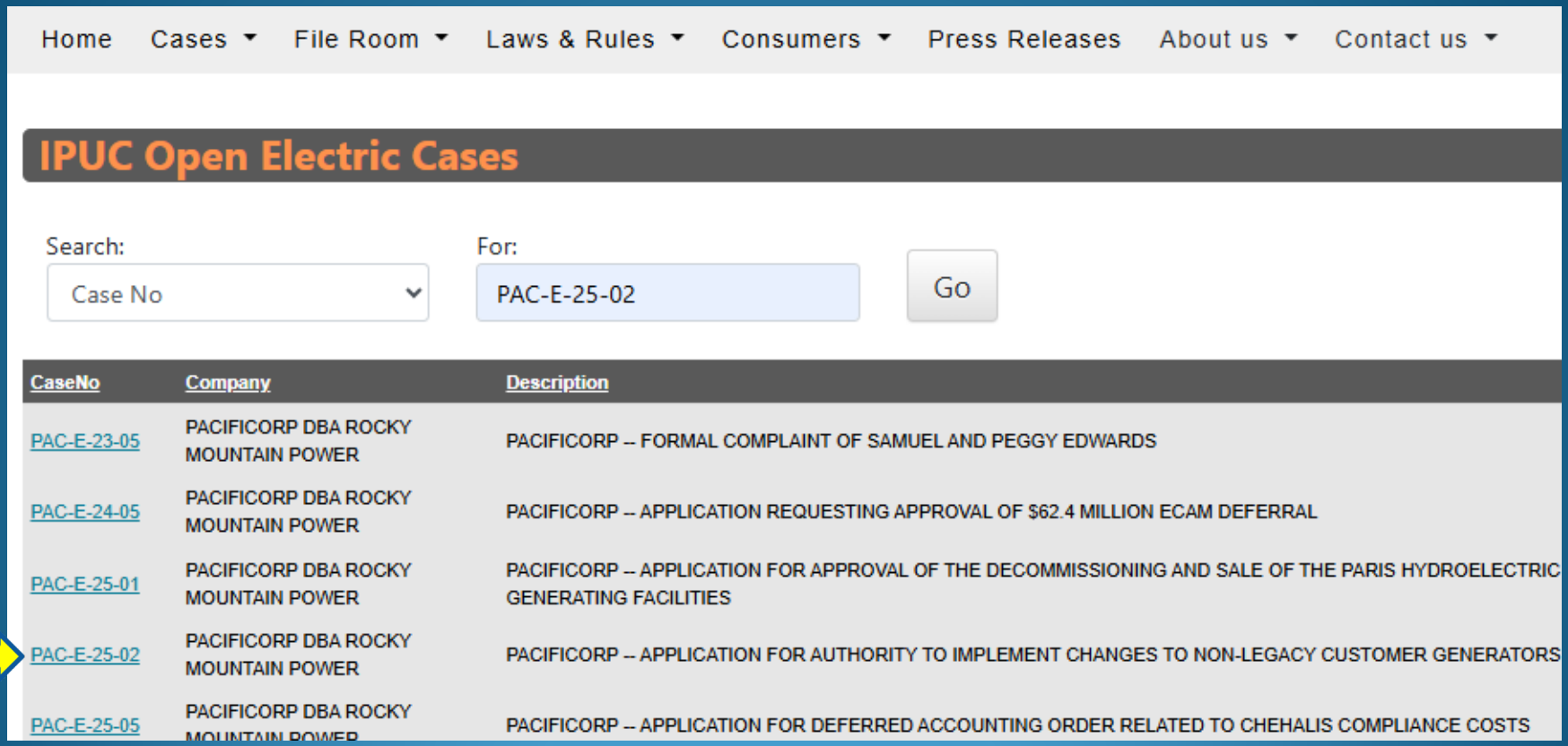

Case Summary Page

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Case Summary

Last Updated	Case Number	Date Filed	Case Type	Status	Description
02/07/2025	PAC-E-25-02	02/07/2025	Application	Notice Received	PACIFICORP -- APPLICATION FOR AUTHORITY TO IMPLEMENT CHANGES TO NON-LEGACY CUSTOMER GENERATORS

Case Files

02/07/2025 APPLICATION.PDF

Public Comments

02/20/2025 COMMENT_1.PDF
02/24/2025 COMMENTS_19.PDF
02/25/2025 COMMENTS_8.PDF
02/27/2025 COMMENTS_8.PDF
03/03/2025 COMMENTS_16.PDF
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03/06/2025 COMMENTS_3.PDF
03/07/2025 COMMENTS_1.PDF
03/10/2025 COMMENTS_4.PDF
03/11/2025 COMMENTS_11.PDF
03/12/2025 COMMENTS_9.PDF

Where do we go from here?

- Customers can subscribe to the Commission's RSS feed to receive updates about all cases via email.
- Written comments are due by **August 14, 2025**.
- Virtual Public Customer Hearing, date is **August 19, 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 PAC-E-25-02

Direct: (208) 334-0300
Toll-Free: (800) 432-0369
Fax: (208) 334-3762

Questions?

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