

Benjamin J. Otto (ISB No. 8292)
710 N 6th Street
Boise, ID 83701
Ph: (208) 345-6933 x 12
Fax: (208) 344-0344
botto@idahoconservation.org

RECEIVED

2016 APR -6 PM 1:13

IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE)	
APPLICATION OF ROCKY)	CASE NO. PAC-E-16-07
MOUNTAIN POWER REQUESTING)	
AUTHORITY TO MODIFY ELECTRIC)	IDAHO CONSERVATION LEAGUE
SERVICE SCHEDULE 135 – NET)	
METERING SERVICE)	COMMENTS

COMES NOW the Idaho Conservation League (ICL) with the following comments regarding Rocky Mountain Power’s (RMP) request to raise the net metering cap. As explained fully below, ICL encourages the Commission to follow the same logic as applied to Idaho Power’s request to modify the net metering cap for that utility. Instead of applying a program cap set at an arbitrary amount of kilowatts, the Commission should find it “reasonable and prudent for the Company to closely monitor the net metering service and to provide an annual appraisal of the service’s status and impact on the reliability of the Company’s system.” *Order No 32846 at 7.*

Net Metering Program Cap

ICL agrees that a possible purpose of capping the net metering capacity is to provide a check-in point to review the program and make any warranted and reasonable adjustments. ICL also acknowledges the RMP attempted to calculate a cap that accounted for possible growth in net metered system until roughly 2018 and proposes a program cap of 2 megawatts. *Application at 7.* But, it is system reliability and potential cost impacts that matter, not just a number based on RMP’s vision of potential growth. Two megawatts of net metered systems is simply not a meaningful number when the eastern portion of RMP’s system has 6,910 MW of capacity and 897 MW of reserves, and the western portion has another 3,221 MW of capacity and 412 MW of reserves. *PacifiCorp 2015 IRP Update at 31.* Even assuming Idaho is 5% of PacifiCorp’s system, 2 MW here is *de minimus*, not a meaningful program cap.