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Owner – Gietzen Solar, LLC

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

<b>IN THE MATTER OF IDAHO</b>	)	
<b>POWER COMPANY’S</b>	)	
<b>APPLICATION FOR AUTHORITY</b>	)	<b>CASE NO. IPC-E-20-26</b>
<b>TO MODIFY SCHEDULE 84’S</b>	)	
<b>METERING REQUIREMENTS AND</b>	)	<b>GIETZEN SOLAR LLC’S</b>
<b>TO GRANDFATHER EXISTING</b>	)	<b>PETITION FOR RECONSIDERATION</b>
<b>CUSTOMERS WITH TWO</b>	)	
<b>METERS</b>	)	

Gietzen Solar, LLC respectfully requests that the Commission clarify and/or reconsider the portion of Order No. 34854 regarding the eligibility for legacy treatment for customers who have applied for interconnection under Schedule 84 by the service date of the order. Idaho Power Company’s existing procedure for processing the applications that were received by the order date has exposed both my company and our customers to potential discrimination.

Gietzen Solar has recently submitted more than a dozen applications on behalf of committed potential Schedule 84 customers in direct response to matters covered in Order 34854. All of those applications and their application fees were either submitted via email or postmarked by or before the December 1st date of Order 34854. Idaho Power has informed us that while the emailed *applications* were received by the date of the order the mailed *application fees* were not received by December 1st and therefore those customers will not receive grandfathered status.

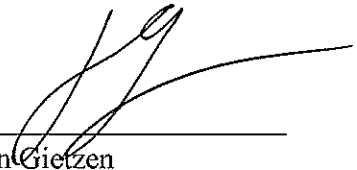
We believe Idaho Power's differentiating the application fee from the actual application in order for a customer's application to be complete discriminates against rural customers. The Company has not provided its customers a method to pay application fees beyond a letter carrier or physical delivery. Applications may be submitted via email but the application fee does not have a comparable speedy option. Customers who physically reside close to the location where net metering applications are received (1221 W Idaho St, Boise, ID 83702) have an advantage over rural customers who did not have an option of physically returning the applications to the Company in person. Rural customers are effectively forced to use a letter carrier to deliver the payment portion of their application.

The initial application by the Company for this case was submitted June 19, 2020 and the final order took effect Dec. 1st, 2020. The press release discussing the order was not released until Dec. 4th 2020. A majority of potential Schedule 84 customers would not have been aware of the orders effective date until the press release was sent out. As many commenters noted, this period covered portions of the year when farmers are necessarily dedicated to harvest activities and do not have substantial time available to focus on large financial investments. The scheduling of this docket forced any customer considering applying for Schedule 84 less than six months to make a decision, financially commit to the project and have Idaho Power physically receive the application/application fee. Six months may be enough time to submit applications for small projects but for customers planning multi-million dollar projects that span dozens of individual meters and dozens of individual site locations, potentially MW sized projects, six months is not ample time.

Recognizing the disadvantage the conflict between this docket's processing during fall harvest and the disadvantage rural customers had to physically deliver an application/application

fee, Gietzen Solar is requesting the commission to order Idaho Power to accept for eligibility any and all applications/application fees that were postmarked by the date of the order as being received on or before the date of the order. This allows rural customers, at a minimum, to have the same opportunities that customers physically located close to Idaho Power had when submitting applications.

Dated: December 17<sup>th</sup>, 2020



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Logan Gietzen  
*Owner, Gietzen Solar*

## CERTIFICATE OF SERVICE

I hereby certify that I have on this 17th day of December 2020 served the foregoing documents on all parties of counsel via Email:

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