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November 17, 2020

ELECTRONIC FILING

Jan Noriyuki, Secretary
Idaho Public Utilities Commission
11331 W. Chinden Boulevard
Building 8, Suite 201-A
Boise, Idaho 83714

Re: Case No. IPC-E-20-26
In the Matter of Idaho Power Company's Application for Authority to
Modify Schedule 84's Metering Requirement and to Grandfather Existing
Customers with Two Meters

Dear Ms. Noriyuki:

Attached for electronic filing, pursuant to Order No. 34602, is Idaho Power Company's Reply Comments.

If you have any questions about the attached document, please do not hesitate to contact me.

Very truly yours,

Lisa D. Nordstrom

LDN:slb
Attachment

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Attorney for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)	
COMPANY'S APPLICATION FOR)	CASE NO. IPC-E-20-26
AUTHORITY TO MODIFY SCHEDULE)	
84's METERING REQUIREMENT AND TO)	IDAHO POWER COMPANY'S
GRANDFATHER EXISTING CUSTOMERS)	REPLY COMMENTS
WITH TWO METERS.)	
)	

Idaho Power Company ("Idaho Power" or the "Company") respects its customers' desire to self-generate electricity. To better facilitate this, Idaho Power proposes to modify the interconnection requirement from a two-meter to a single-meter interconnection requirement to reduce customer costs and administrative complexities associated with interconnection under Schedule 84, Customer Energy Production Net Metering Service ("Schedule 84"). While the Idaho Public Utilities Commission ("Commission") has directed that grandfathered status be provided to Idaho Power

Residential & Small General Service ("R&SGS") customer-generators¹ and Rocky Mountain Power's net metering participants,² such treatment does not yet exist for Idaho Power's Commercial, Industrial & Irrigation ("CI&I") customer-generators. To that end, simultaneous with the implementation of a single-meter requirement, the Company requests that the Commission grandfather existing customers and applicants with two meters under the current one-for-one net metering billing construct provided for in Schedule 84. Establishing a clear delineation between grandfathered CI&I net metering customers and those for which future changes will apply will better position the Company to engage with interested parties from all customer segments to develop its upcoming study of the compensation structure and uniform export credit rate.

I. BACKGROUND

The Company filed an Application on June 19, 2020, requesting Commission authorization to: (1) modify the metering requirement under Schedule 84 from a two-meter to a single-meter requirement on December 1, 2020, or another date as ordered by the Commission ("Effective Date") and (2) simultaneous with the implementation of a single-meter requirement, grandfather existing customers and applicants with two meters under the current one-for-one net metering billing construct provided for in Schedule 84, for a period of no more than ten (10) years. If the Company's proposal is approved, all new single-metered systems would not be grandfathered, and therefore would be subject

¹ *In the Matter of the Petition of Idaho Power Company to Study the Costs, Benefits, and Compensation of Net Excess Energy Supplied by Customer On-Site Generation*, Case No. IPC-E-18-15, Order Nos. 34509 (December 20, 2019) and 34546 (February 5, 2020). Grandfathered demarcation date December 20, 2019, including customers that made a financial commitment before this date and interconnect within one year.

² *In the Matter of the Application of Rocky Mountain Power to Close the Net Metering Program to New Service & Implement a Net Billing Program to Compensate Customer-Generators for Exported Generation*, Case No. PAC-E-19-08, Adopting Order No. 34798 (October 2, 2020). Grandfathered demarcation date October 2, 2020, including customers that interconnect within one year.

to any future Commission-approved changes to the billing and compensation structure under Schedule 84 or a successor tariff offering, ordered by the Commission.

Parties of record filed comments, including the Commission Staff ("Staff"), City of Boise, Idaho Conservation League ("ICL"), Idaho Sierra Club joined by Idaho Clean Energy Association ("Sierra Club"), and Russell Schiermeier, on October 27, 2020. Pursuant to the Notice of Modified Procedure issued by the Commission in Order No. 34777, Idaho Power hereby submits its Reply Comments responding to parties' proposals and addressing why it is appropriate for the Commission to establish grandfathering now for Idaho Power's CI&I customers taking service under Schedule 84.

II. SCHEDULE 84 METERING CONFIGURATION

Before filing this request, Idaho Power's discussions with customers, installers, and other stakeholders indicated that modification of Schedule 84 to accommodate a single-meter configuration could reduce the costs and complexities of an on-site generation interconnection for Schedule 84 customers. The Company appreciates Staff's support for the Company's proposal to require new Schedule 84 customer-generators to be metered through a single meter.³ The Company also notes that while no other party opposed a modification in the metering requirement to a single-meter installation, several parties introduced additional proposals for the Commission's consideration. The Company addresses each of those below.

³ Staff Comments at 2.

A. Modification to a Single-Meter Requirement Does Not Impact the Existing Meter Aggregation Rules for Excess Net Energy.

The Company has evaluated the concerns raised in Russell Schiermeier's comments, as well as concerns raised in public testimony, regarding existing systems "specifically designed to aggregate to larger load sites."⁴ No changes to existing meter aggregation rules have been discussed or recommended in the Company's Application or the proposed revisions to Schedule 84, Conditions of Purchase and Sale, Section 2. To clarify, both existing two-meter and new single-meter Schedule 84 systems would have the opportunity to aggregate Excess Net Energy credits pursuant to the existing provisions of Schedule 84. Under the Company's current proposal in this case, existing and new Schedule 84 customers would see no change in how Excess Net Energy credits are treated.

B. The Commission Should Implement a Single-Meter Interconnection for All New Installations and Allow Existing Schedule 84 Customer-Generators to Retain the Two-Meter Systems.

While Staff supports the Company's proposal to require new Schedule 84 customer-generators to install a single-meter,⁵ both ICL and the City of Boise suggest that the Commission should authorize new Schedule 84 customers to choose between a single- or two-meter option.⁶ It is important to note, neither ICL nor the City of Boise provides evidence to validate the suggestion that "some solar-owners may elect to pursue [a dual meter option] because it would better serve their needs."⁷ On the contrary, if the

⁴ Russell Schiermeier Comments at 5.

⁵ Staff Comments at 2.

⁶ ICL Comments at 2. City of Boise Comments at 3.

⁷ ICL Comments at 2.

Commission were to allow customers to choose between a single- or two-meter option, it would result in "incremental costs and complexities"⁸ for two-meter systems – neither of which better serves customer needs. Every installation of a second meter, configured as required under the existing Schedule 84, requires customers to incur additional expense that would not be necessary under a single-meter configuration. The Commission initially approved two-meter interconnections for CI&I customer-generators under Schedule 84 to allow for the recovery of demand-related charges,⁹ not for customer preference. Further, these future dual-metered installations would be differently situated from other single-meter installations. Their billing configurations would be based on different data: the dual-metered customers would not be able to offset demand, while the single-metered customers could.

ICL also incorrectly assumes that "if Schedule 84 mandates that all customer-owned systems use a single-meter, current solar-owners with dual meters will be out of compliance when the grandfathering period expires since their system will not conform to the tariff."¹⁰ It is common practice for a tariff schedule to be modified to close a particular offering to new customers without inhibiting the service schedule's eligibility for existing customers. Attachment 1 of the Company's Application illustrates that the Applicability section defines that the "Two-Meter Interconnection" would be closed to new applicants as of the Effective Date, and that the "Single-Meter Interconnection" would be applicable to new applicants as of the Effective Date. Therefore, under the Company's proposal,

⁸ Aschenbrenner, DI at 15.

⁹ *In the Matter of the Application of Idaho Power Company for Amendments to Schedule 84 – Net Metering*, Case No. IPC-E-02-04, Order No. 29094 (August 21, 2002).

¹⁰ ICL Comments at 2.

two-meter grandfathered systems would still be in compliance when the grandfathering period expires.

Implementing a single-meter interconnection for all new Schedule 84 installations is also consistent with other net metering interconnection requirements in Idaho. The Company is not aware of other electric utilities in Idaho that allow customers to install on-site generation under a two-meter configuration. ICL references a Commission order in their comments, highlighting that "[t]he Commission has consistently tried to align the net metering programs between Idaho utilities to the extent reasonable,"¹¹ which suggests it would be more reasonable for the Commission to require all new Schedule 84 customers to interconnect under a single-meter configuration.

Staff believes the Commission should allow existing Schedule 84 customer-generators to retain two-meter systems indefinitely.¹² While it is not opposed to Staff's position in principle, the Company believes it is imperative to note whether a dual-meter would need to convert to a single-meter to accommodate a future billing structure would depend on the billing structure implemented at that future point in time. The Company believes this evaluation could be accomplished through a future filing, for the Commission's consideration, well in advance of the date when the grandfathering period for Schedule 84 expires to present a recommendation related to how two-metered sites are transitioned to a successor tariff.

¹¹ ICL Comments at 8 citing Case No. PAC-E-19-08, Proposed Order No 34752 at 7 (later adopted by Order No. 34798).

¹² Staff Comments, at 3.

III. GRANDFATHERING

A. As Has Been Done for Other Idaho Power and Rocky Mountain Power Customer-Generators, The Commission Should Determine the Grandfather Status of Idaho Power's CI&I Customers Without Delay.

As it did in Case No. IPC-E-18-15 for R&SGS customers, the Commission should resolve the issue of grandfathering in this case for CI&I customers. In its Application filed in this case, the Company argued that a differing meter configuration (a two-meter versus a single-meter requirement) provides a reasonable distinction for purposes of grandfathering.¹³ In developing its initial recommendation, the Company considered the Commission's position in Case Nos. IPC-E-18-15 and IPC-E-19-15 related to CI&I customers.

As noted by several parties, after the Company submitted its Application in Case No. IPC-E-20-26, the Commission issued an order grandfathering Rocky Mountain Power's customer-generators.¹⁴ The Commission found it "fair, just, reasonable, non-discriminatory, and in the public interest to grandfather existing Rocky Mountain Power customer-generators on the same terms the Commission granted existing Idaho Power customer-generators in IPC-E-18-15."¹⁵ The Commission also stated that Rocky Mountain Power customer-generators were similarly situated "in their reasonable expectations of fundamental program stability" and noted, "the Commission has consistently tried to align the net metering programs between Idaho utilities to the extent reasonable."¹⁶

¹³ Application at 5. Aschenbrenner DI, at 15.

¹⁴ Case No. PAC-E-19-08, Order No. 34798 adopting Proposed Order No. 34752.

¹⁵ Order No 34752, at 7.

¹⁶ *Id.*

The Commission grandfathered existing Idaho Power R&SGS customer-generators and all Rocky Mountain Power customer-generators on the basis that it was no longer reasonable for a customer to assume the net metering program fundamentals will remain the same over the expected payback period of their investment.¹⁷ As noted in parties' comments and the public testimony on the record in Case No. IPC-E-20-26, Idaho Power CI&I customer-generators are similarly situated, as they have generally testified to making investments with the expectation that existing program fundamentals would remain.

B. The Commission's Determination on Grandfathering Now is Critical to Notify Potential Customers That it is No Longer Reasonable to Assume the Net-Metering Fundamentals Will Remain the Same Over the Expected Payback Period.

The Comments of Staff and the City of Boise suggest that the Commission should defer a decision on grandfathering existing Schedule 84 customers – Staff argues deferring until a successor program is proposed, and City of Boise argues until a comprehensive study of on-site generation has been completed.¹⁸ ICL and Sierra Club indicate that the Commission should make a grandfather status determination now but align the grandfathering date with establishing a successor tariff.¹⁹ However, these positions are counter to what the Commission found in Case Nos. IPC-E-18-15 and PAC-E-19-08, and would create an unnecessary difference in the treatment of Idaho Power's CI&I customer-generators as compared to similarly situated Idaho Power and Rocky Mountain Power customer-generators. In Case No. IPC-E-18-15, Order No. 34546, the

¹⁷ Order Nos. 34509 at 10 and 34752 at 7.

¹⁸ Staff Comments at 4, City of Boise Comments at 4.

¹⁹ ICL Comments at 3, Sierra Club Comments at 1.

Commission stated the following regarding the timing at which customers are eligible for grandfathered status:

We decided to grandfather customers based on our acknowledgment that, until that point, customers reasonably could have believed that the fundamentals of the net metering program would not change...it would contravene our rationale to extend the date at which customers are eligible for grandfather status, and we therefore decline to do so.²⁰ (emphasis added)

The Commission has made the decision to grandfather existing net-metering customers without a successor schedule or a study. Staff's comments restate the Commission finding in Case No. IPC-E-18-15: "customers who have made significant investments in on-site generation systems reasonably differ from customers who have not yet made significant investments in on-site generation systems, and this difference justifies separate treatment."²¹ The suggestion to defer a decision on grandfathering, in this case, would not only result in preferential treatment for similarly situated customer-generators but relies on contradictory policy and, as a result, will create confusion for customers.

Both ICL and Sierra Club suggest that grandfathering existing customers now without a successor tariff is not fair, just, or reasonable. ICL states that such a decision will result in "leaving customers with no option but to purchase from...Idaho Power,"²² and Sierra Club states that "[a] fair and assessable opportunity to self-generate is vital to many customers."²³ As previously mentioned, the Commission has already made similar decisions in Case Nos. IPC-E-18-15 and PAC-E-19-08. These arguments also incorrectly

²⁰ Order No. 34546 at 10.

²¹ Staff Comments at 8 citing Order No. 34509 at 12.

²² ICL Comments at 3.

²³ Sierra Club Comments at 3.

assume that existing customers have no applicable net metering tariff schedule to install on-site generation. Prospective CI&I customers would continue to have the ability to install on-site generation to offset all or a portion of their energy under Schedule 84 single-meter option after the Effective Date or to install a non-exporting system without similar limitations on installed system capacity.²⁴

Sierra Club also argues that the Commission's decision to grandfather R&SGS customers in Case No. IPC-E-18-15 resulted in a greater than 40 percent reduction in solar installation capacity.²⁵ This provocative overstatement ignores the impact of the decrease in the solar investment tax credit, which also occurred in December 2019, and the economic impact of the COVID-19 pandemic that began to affect Idaho Power customers early in 2020. The reduction claimed by Sierra Club compares the capacity installed in a single month (December 2019) to the capacity installed in a different month (August 2020), which is arbitrary and ignores the impact of seasonality. Figure 1 provides a more accurate representation of the change in installed solar capacity for R&SGS customers for the months following the Commission's decision in Case No. IPC-E-18-15.

Figure 1

Solar Capacity Installed (Idaho Schedules 6 & 8)	
Time Period	MW Installed
December 2018 - August 2019	10.4
December 2019 - August 2020	9.3
Year-over-year % change	(11%)

²⁴ On July 20, 2020, the Company filed an application seeking to implement a non-export option and requested no size limitations for customers taking service under Schedules 9, 19, or 24 (CI&I customers). See, *In the Matter of Idaho Power Company's Application for Authority to Establish Tariff Schedule 68, Interconnections to Customer Distributed Energy Resources*, Case No. IPC-E-20-30.

²⁵ Sierra Club Comments at 3.

Figure 1 compares the year-over-year change for the months December through August for the data provided as Attachment 1 in response to Sierra Club's Discovery Request No. 4. Installed solar capacity for R&SGS customers for the months December 2019 through August 2020 decreased from 10.4 MW to 9.3 MW, or 11 percent year-over-year. However, to suggest that any reduction in installed capacity is isolated to the Commission's decision to grandfather – in light of other macroeconomic conditions – is speculative and misguided.

Now is the appropriate time for the Commission to determine the grandfather status for Schedule 84 customer-generators. The following rationale all support the conclusion that existing two-meter systems should be grandfathered as of the Effective Date of a Schedule 84 single-meter requirement: (1) the modification to a single-meter requirement physically and functionally differentiates existing customer-generators from new customer-generators, (2) the requested delineation provides formal notice from the Commission that it is no longer reasonable for CI&I customers to expect the net-metering fundamentals to remain the same, and (3) the proposed grandfathering treatment provides reasonable accommodation for customers who have made a significant investment in on-site generation prior to notice from the Commission. Therefore, the Company requests that the Commission grandfather existing two-meter Schedule 84 customers simultaneous with a change to a single-meter requirement as of the Effective Date.

C. A 10-Year Grandfathering Period is Reasonable for the Business and Regulatory Savvy CI&I Customer Segment; However, the Company Recognizes There Are Reasons for Which the Commission May Consider a 25-Year Grandfathering Period.

In the Company's Application, Idaho Power proposed a 10-year grandfathering period for existing Schedule 84 customers. In Case No. IPC-E-19-15, the Commission declined to suspend Schedule 84, stating, "CI&I customers are well-versed in both regulatory proceedings and this Commission's authority and responsibilities."²⁶ The Company contends that it is reasonable for the Commission to approve a 10-year grandfathering period for Schedule 84 systems due to the reasonable expectation that CI&I customers, to a greater extent than R&SGS customers, understood the fundamentals associated with the net metering service offering would be subject to change. The Company disagrees with ICL's misrepresentation that the Company's rationale for a 10-year grandfathering period in its Application was "a mere 'belief' in the ability of some customers to have a better understanding than other customers."²⁷

However, the Company also understands the rationale and merit for the positions presented by Staff and Russell Schiermeier's filed Comments. Staff states that the "public testimony in this case demonstrates that Schedule 84 customers have been making investment decisions under many of the same assumptions that Schedule 6 and Schedule 8 customers made their decisions."²⁸ Russell Schiermeier states that "[j]ust like the residential customers were addressed in IPC-E-18-15, the irrigation customers were

²⁶ *In the Matter of Idaho Power's Application to Evaluate Schedule 84 – Net Metering*, IPC-E-19-15, Order No. 34335 at 2.

²⁷ ICL Comments at 8.

²⁸ Staff Comments at 7.

under the same understanding."²⁹ The positions of Staff and Russell Schiermeier support the position that Schedule 84 customer-generators are similarly situated to those customer-generators in Case No. IPC-E-18-15.

In further support of a 25-year grandfathering period, Staff and ICL's comments both reference PAC-E-19-08 and Order No. 34752, where the Commission found:

...it is fair, just, reasonable, nondiscriminatory, and in the public interest to grandfather existing Rocky Mountain Power customer generators on the same terms the Commission granted existing Idaho Power customer-generators in IPC-E-18-15. There has been no showing of how Rocky Mountain Power customer-generators are differently situated than Idaho Power customers in their reasonable expectations of fundamental program stability. The Commission has consistently tried to align the net metering programs between Idaho utilities to the extent possible. See Order No. 29260 at 6.³⁰ (emphasis added)

The Company's Application in Case No. IPC-E-20-26 was filed before Order No. 34752 was issued by the Commission. The Company did not have the same information when the 10-year grandfathering period was proposed as parties had in advance of filing their respective comments on October 27, 2020.

The Company acknowledges Staff's argument that if the Commission issues a determination on grandfathering in this case, that a 25-year period is reasonable based on the premise that CI&I customers may "look at the treatment that Schedule 6 and Schedule 8 customers received, and reasonably conclude that the Commission would grant them grandfathering treatment on the same or similar terms."³¹ Staff also stated that "[e]xisting Schedule 84 customers have made the same, if not more substantial types

²⁹ Russell Schiermeier Comments, at 6.

³⁰ Order No 34752, at 7.

³¹ Staff Comments at 7.

of investments as Schedule 6 and Schedule 8 customers, based on many of the same principles."³² In light of the Commission's position in IPC-E-18-15, PAC-E-19-08, and comments from Staff, other parties, and public testimony in Case No. IPC-E-20-26, the Company recognizes it is reasonable for the Commission to assess the merits of a grandfather period of 25 years for existing Schedule 84 systems.

IV. SCHEDULE 84 100-KW CAP

A review of the 100-kW nameplate capacity cap is outside the scope of this case and is appropriately considered only after program fundamentals, including pricing for exports, have been addressed. The 100-kW cap contained in Schedule 84 was initially established by the Commission in Case No. IPC-E-02-04, Order No. 29094. The rationale for a cap for individual installations of 25-kW (for R&SGS customers) and 100-kW (for CI&I customers) was to limit the amount that other customers subsidize some of the costs of serving net metering customers.³³ As highlighted in Staff's comments in Case No. IPC-E-01-39, "[f]or the Commission to accept a net metering tariff where customer generation is credited at full retail rates, it must be willing to accept the fact that Idaho Power may not recover its full costs of providing service from net metering customers."³⁴ Additionally, in implementing the cap, the Commission noted a reasonable limit for CI&I customers should align with the Federal Energy Regulatory Commission minimum qualifying facility size of 100 kW.³⁵

³² Staff Comments at 8.

³³ Order No. 29094 at 3, citing Order No. 28951 at 11.

³⁴ *In the Matter of the Application of Idaho Power Company for Approval of a New Schedule 84 – Net Metering Tariff*, IPC-E-01-39, Staff Comments at 3.

³⁵ *In the Matter of the Application of Idaho Power Company for Approval of a New Schedule 84 – Net Metering Tariff*, IPC-E-01-39, Order No. 28951, at 11.

Idaho Power disagrees with Sierra Club's suggestion that the 100-kW cap should be evaluated in this case. An evaluation of the 100-kW cap is most appropriately considered after the net metering underlying fundamentals are addressed, such as measurement interval and excess net energy compensation. The request in this filing is appropriately limited in scope, and only seeks to streamline the interconnection process by modifying to a single-meter requirement and implement grandfathering for existing Schedule 84 customers.

Moreover, discussion of this unrelated issue has not been noticed to properly elicit comments from interested persons that could provide the Commission with a reasonable evidentiary basis to evaluate changes to the 100-kW cap. Because no party to this case has presented any changes to Schedule 84 that would address cost-shifting concerns the 100-kW cap was intended to mitigate, it would be inappropriate to evaluate or modify the cap in this case. A review of the 100-kW cap is only appropriately considered after program fundamentals, including pricing for exports, have been addressed.

V. STUDY COSTS AND BENEFITS OF DISTRIBUTED ON-SITE GENERATION

Idaho Power appreciates the comments from parties requesting that Idaho Power initiate a filing to study the compensation structure and export credit rate following the process the Commission laid out in Order Nos. 34509 and 34546. The Company looks forward to the opportunity to collaborate with interested stakeholders and appreciates the thoughtful analysis conducted by Sierra Club and reflected in its comments.

Idaho Power's intent regarding all net metering issues is to address pricing equitably. Additionally, as stated in filed testimony in this case, resolving grandfathering for Idaho Power's remaining customer classes will: "enable the Company and interested

stakeholders to address a study of the costs and benefits of distributed on-site generation to the Company's system."³⁶ ICL claims that "Idaho Power states in regards to all net metering issues, a primary goal for the utility is to slow the growth of customer-owned solar."³⁷ Idaho Power takes exception to this allegation; it is not only a mischaracterization of the Company's intent but contrary to Idaho Power's explicit statements made on its website and customer communication documents.^{38, 39} Moreover, through its actions, the Company has sought Commission approval to eliminate the two-meter requirement in Case No. IPC-E-20-26 and, in Case No. IPC-E-20-30, institute a non-export option to further remove barriers to entry that exist for all customers who wish to install on-site generation. The Company intends to submit a filing to formally initiate a comprehensive study of the costs and benefits of distributed on-site generation upon completion of Case Nos. IPC-E-20-26 and IPC-E-20-30.

VI. CONCLUSION

The Company's proposal in this case to modify the interconnection requirement from a two-meter to a single-meter configuration will reduce barriers for customers and reduce complexities associated with Schedule 84 interconnection. In response to other proposals suggested by parties' comments, Idaho Power reiterates its position that: (1) modification to a single-meter requirement does not impact the existing meter aggregation

³⁶ Aschenbrenner, DI at 25.

³⁷ *In the Matter of Idaho Power Company's Application for Authority to Modify Schedule 84's Metering Requirement and to Grandfather Existing Customers with Two Meters*, Case No. IPC-E-20-26, ICL Comments at 3.

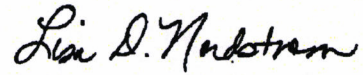
³⁸ <https://www.idahopower.com/energy-environment/green-choices/solar-power-options-customer-generation/>

³⁹ <https://www.idahopower.com/energy-environment/green-choices/solar-power-options-customer-generation/frequently-asked-questions/>

rules; (2) it is reasonable for the Commission to implement a single-meter interconnection for all new Schedule 84 installations and allow existing Schedule 84 customer-generators to retain the two-meter systems; and (3) a review of the 100-kW cap is out of scope for this case and only appropriately considered after program fundamentals, including the pricing for exports, have been addressed.

Simultaneous with the implementation of a single-meter requirement, the Company requests that the Commission grandfather existing customers and applicants with two meters under the current one-for-one net metering billing construct provided for in Schedule 84, for a period of no more than ten (10) years. As described above, there are no distinguishing factors that would suggest that Idaho Power's CI&I customers should not be grandfathered. The Company believes it is prudent to decide on grandfathering now to notify potential customers that it is no longer reasonable to assume the net-metering fundamentals will remain the same over the expected payback period. Idaho Power contends that a 10-year grandfathering period is reasonable; however, the Company recognizes there may be reasons for the Commission to consider a 25-year grandfathering period. Modifying the metering requirement and grandfathering existing and pending Schedule 84 systems will eliminate the uncertainty regarding the applicability of grandfathering and future changes to the compensation structure and valuation of the export credit rate. A decision to grandfather will create clarity as to the applicability of future changes in response to a study of the compensation structure and export credit rate.

DATED at Boise, Idaho, this 17th day of November 2020.

A handwritten signature in cursive script, reading "Lisa D. Nordstrom".

LISA D. NORDSTROM
Attorney for Idaho Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of November, 2020 I served a true and correct copy of the within and foregoing IDAHO POWER COMPANY'S REPLY COMMENTS upon the following named parties by the method indicated below, and addressed to the following:

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