



September 10, 2020

***VIA ELECTRONIC FILING***

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

**Re: CASE NO. PAC-E-19-08  
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**

Dear Ms. Noriyuki:

Please find an electronic filing of Rocky Mountain Power's Exception Comments in the above referenced matter.

Informal inquiries may be directed to Ted Weston, Idaho Regulatory Manager at (801) 220-2963.

Very truly yours,

A handwritten signature in blue ink that reads "Joelle Steward".

Joelle Steward  
Vice President, Regulation

Emily Wegener  
1407 West North Temple, Suite 320  
Salt Lake City, Utah 84116  
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*Attorney for Rocky Mountain Power*

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF THE APPLICATION )  
OF ROCKY MOUNTAIN POWER TO ) CASE NO. PAC-E-19-08  
CLOSE THE NET METERING PROGRAM )  
TO NEW SERVICE & IMPLEMENT A NET ) EXCEPTION COMMENTS OF  
BILLING PROGRAM TO COMPENSATE ) ROCKY MOUNTAIN POWER  
CUSTOMER GENERATORS FOR )  
EXPORTED GENERATION )**

Pursuant to Order No. 34752<sup>1</sup> issued by the Idaho Public Utilities Commission (“Commission”) on August 26, 2020, Rocky Mountain Power a division of PacifiCorp (the “Company”) hereby submits exception comments in the above-referenced matter.

**I. BACKGROUND**

1. On August 26, 2020, the Commission issued a “Proposed” Order granting grandfathering for customers on Electric Service Schedule No. 135 – Net Metering Service. The Commission also proposed to approve the Company’s request to open Electric Service Schedule No. 136 – Net Billing Service, as of October 1, 2020.

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<sup>1</sup> *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, Proposed Order on Grandfathering Order No. 34752.*

## II. EXCEPTION COMMENTS

2. In the Company's original Application it requested one month between the closure of Schedule 135 on December 31, 2019 before offering Schedule 136 February 1, 2020, to provide sufficient time to make the necessary modifications to its billing system.

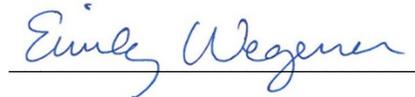
3. In Order 34752 the Commission "proposes" to approve Schedule 136 effective October 1, 2020. The Company requests the same one month delay between the closure date of Schedule 135 and initial offering of Schedule 136 to allow the Company time to update its billing system.

## III. REQUEST FOR RELIEF

Rocky Mountain Power respectfully requests that when the Commission issues its final order it provides the Company one month from the closure date of Schedule 135 before offering Schedule 136.

DATED this 10<sup>th</sup> day of September, 2020.

Respectfully submitted,  
ROCKY MOUNTAIN POWER



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*Attorney for Rocky Mountain Power*

## CERTIFICATE OF SERVICE

I hereby certify that on this 10<sup>th</sup> of September, 2020, I caused to be served, via electronic mail a true and correct copy of Rocky Mountain Power's Exception Comments in Case No. PAC-E-19-08 to the following:

### Service List

<b>Idaho Irrigation Pumpers Association, Inc.</b>	
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<b>Idaho Conservation League</b>	
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<b>Idaho Clean Energy Association, Inc.</b>	
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<b>Commission Staff</b>	
Edward Jewell Deputy Attorney General Idaho Public Utilities Commission 11331 W. Chinden Blvd., Bldg No. 8, Suite 201-A PO Box 83720 Boise, ID 83720-0074 <a href="mailto:edward.jewell@puc.idaho.gov">edward.jewell@puc.idaho.gov</a>	

<b>Rocky Mountain Power</b>	
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Dated this 10<sup>th</sup> day of September, 2020.




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Katie Savarin  
 Coordinator, Regulatory Operations