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IDAHO PUBLIC  
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*Attorneys for Idaho Clean Energy Association*

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER 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**

IDAHO CLEAN ENERGY ASSOCIATION'S  
COMMENTS REGARDING PROPOSED  
ORDER ON GRANDFATHERING EXISTING  
CUSTOMER-GENERATORS (ORDER NO.  
34752)

Idaho Clean Energy Association, Inc. ("ICEA"), respectfully submits the following brief in response to the Idaho Public Utilities Commission's (the "Commission") Proposed Order on Grandfathering Existing Customer-Generators, Order No. 34752, issued on August 26, 2020.

ICEA agrees with the findings of the Commission set forth in the Proposed Order, and to the terms on which grandfathering is proposed. ICEA submits that the findings and terms reflect just, reasonable, and fair treatment of net metering customers of Rocky Mountain Power.

ICEA does note that grandfathering existing customers before a replacement net metering program is in place creates significant uncertainty in the marketplace. Customers that are considering net metering have no basis on which to make the key decisions that should underpin an investment. In addition, companies that sell net metering systems have no basis to predict to customers what a future program might look like. Unfortunately, these circumstances can create

uncertainty that prevents customers from making an investment, or conditions under which industry participants make representations based on their best judgment that may turn out to be incorrect. Either way, closing one program without establishing the next creates a period of uncertainty that is detrimental to consumers and the industry.

For these reasons, ICEA submits that grandfathering, on the terms set forth in the Proposed Order, should apply to customers who have interconnected as of the service date of an order adopting a replacement net metering program, or who have applied to the Company for interconnection as of the service date of an order adopting a replacement net metering program and successfully interconnect within one year of the date of their application.

Dated: September 16, 2020.

GIVENS PURSLEY LLP



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Preston N. Carter  
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*Attorneys for Idaho Clean Energy Association, Inc.*

## CERTIFICATE OF SERVICE

I certify that on September 16, 2020, a true and correct copy of IDAHO CLEAN ENERGY ASSOCIATION'S BRIEF REGARDING PROPOSED ORDER ON GRANDFATHERING was served upon all parties of record in this proceeding via electronic means as indicated below:

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