

RECEIVED

2020 SEP 17 AM 9:43

IDAHO PUBLIC UTILITIES COMMISSION

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

Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE)	
APPLICATION OF ROCKY)	CASE NO. PAC-E-19-08
MOUNTAIN POWER TO CLOSE THE)	
NET METERING PROGRAM TO)	
NEW SERVICE & IMPLEMENT A)	IDAHO CONSERVATION LEAGUE
NET BILLING PROGRAM TO)	
COMPENSATE CUSTOMER)	COMMENT ON PROPOSED ORDER
GENERATORS FOR EXPORTED)	NO. 34752
GENERATION)	

The Idaho Conservation League (ICL) submits the following comments on the Proposed Order No. 34752. ICL supports the Commission’s proposal to respect the private investments made by solar customers who participate in Rocky Mountain Power’s net metering program defined in Schedule 135. A viable and stable net metering program is essential to protecting Idahoan’s rights to invest their own money to meet their own energy needs. The Proposed Order takes the first step towards this goal by applying the same grandfathering treatment devised in Idaho Power’s net metering docket to Rocky Mountain Power customers. We strongly agree with the Commission that “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”.¹

While we support this overall conclusion ICL does have one concerns about the proposed order. Closing the current net metering program before approving a successor program creates vast uncertainty in the market for customer-owned solar, to the detriment of Idahoans and benefit to RMP. This outcome is not fair, just or reasonable. Creating market uncertainty has a huge negative impact on customers who are considering investing their own money while benefiting

¹ Order No. 34752 at 7.

the utility. The unfairness arises from the fact that the utilities assert, and the Commission assumes, some amount of cost shifting as the basis for limiting solar growth. But those assumptions have not actually been rigorously tested by the PUC Staff or other stakeholders by examining a full cost of service study or completing a full, transparent assessment of the value of customer exports. Chilling private investment based on assumptions that favor the utility is not fair to customers. Further, creating this amount of market uncertainty appears to benefit only the utilities as shown by the sudden lack of urgency to address net metering going forward. ICL notes both Idaho Power and Rocky Mountain Power initially claimed near-emergency conditions related to net metering growth. Since closing the Idaho Power program, this emergency apparently has evaporated. And it seems like a similar dynamic will arise with Rocky Mountain Power. As RMP clearly states throughout this docket, a primary goal for the utility is to slow the growth of customer-owned solar and creating market uncertainty achieves this goal about as well as changing the program rates. Finally, chilling the market for customer-owned solar has a large impact on Idahoans who may desire to invest in their own energy needs while having no meaningful impact on RMP's system. In 2019 net metered systems accounted for 0.68% of peak demand in Idaho.²

To protect Idahoan's right to self-supply energy through a viable net metering program, and to encourage Rocky Mountain Power to complete a full, transparent study of the value of customer exports ICL recommends the Commission changed the Proposed Order to establish the eligibility date to remain on Rocky Mountain Power Schedule 135 to be the date the Commission approves a successor customer-owned solar schedule.

Respectfully submitted this 16th day of September, 2020

/s/Benjamin J Otto

Idaho Conservation League

² RMP 2019 IRP Appendix A at 12 (2017 noncoincident peak of 830 MW in 2017, growing at 1.13% equals 848.9 MW in 2019). RMP Application, page 6, states there is a total of 5.8 MW of customer owned solar on their system in Idaho.

CERTIFICATE OF SERVICE

I certify that on the 16th day of September 2020, I delivered true and correct copies of the foregoing COMMENTS ON THE PROPOSED ORDER NO. 34752 to the following via the service method noted:

/s/ Benjamin J. Otto
Idaho Conservation League

Electronic Mail only (Order No 34602)

Idaho Public Utilities Commission

Diane Hanian

Commission Secretary

Idaho Public Utilities Commission

secretary@puc.idaho.gov

Edward Jewell

Deputy Attorney General

Idaho Public Utilities Commission

edward.jewell@puc.idaho.gov

Rocky Mountain Power

Emily Wegener

Ted Weston

Rocky Mountain Power

emily.wegener@pacificorp.com

ted.weston@pacificorp.com

datarequest@pacificorp.com

Adam Lowney

McDowell Rackner Gibson PC

adam@mrg-law.com

Idaho Irrigation Pumpers Association

Eric L. Olsen

ECHO HAWK & OLSEN, PLLC

elo@echohawk.com

Anthony Yankel

tony@yankel.net

Idaho Clean Energy Association

Preston N. Carter

Givens Pursley LLP

prestoncarter@givenspursley.com

kendrah@givenspursley.com

Monsanto

James R. Smith

jim.smith@bayer.com

Randall C. Budge

Thomas J. Budge

Racine Olson, PLLP

randy@racineolson.com

tj@racineolson.com

Brian C. Collins

Maurice Brubaker

Katie Iverson

Brubaker & Associates

bcollins@consultbai.com

mbrubaker@consultbai.com

kiverson@consultbai.com