



SNAKE RIVER ALLIANCE

IDAHO'S NUCLEAR WATCHDOG & CLEAN ENERGY ADVOCATE

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UTILITIES COMMISSION

November 21, 2014

To: Idaho Public Utilities Commission

From: Ken Miller, Clean Energy Program Director, Snake River Alliance

Re: Snake River Alliance Comments In the Matter of the Application of Avista Corporation for the Request to Use Available Funds From Schedule 95 to Promote Rooftop Solar Installations on Commercial Buildings, Case No. AVU-E-14-10.

On behalf of our members throughout Avista Utilities' Idaho service area, the Snake River Alliance appreciates the opportunity to provide its comments on the above-referenced case, filed with the Commission on Sept. 17, 2014. These comments are submitted to the Commission in response to its Notice of Application and Order No. 33151.

In its application, Avista requests approval "to use, when available, funds from Schedule 95 Optional Renewable Power Rate to promote grants for rooftop solar installations, 20 kW or smaller, on commercial buildings in Idaho." The Alliance wholeheartedly supports Avista's application and congratulates Avista's initiative to promote the installation of clean, renewable energy in Idaho. We urge the Commission to approve the application.

Since 2002, Avista's Schedule 95 Optional Wind Power Rate allows its Idaho customers to purchase blocks of renewable power through its "Buck-a-Block" program. The program enables customers to purchase blocks of wind power for \$1 a block (55 kilowatt hours). The program was revised in 2004 from an Optional Wind Power Rate to an Optional Renewable Power Rate, raising each block from 55 kWh of renewable energy to 300 kWh.

Over time, as customer participation leveled off and the cost of RECs declined, the program's surplus revenues exceeded costs by about \$200,000, prompting Avista to seek additional avenues to promote and secure additional energy for the "Buck-a-Block" program. The result is this application, which would permit Avista to use additional Schedule 95 funds, when they are available, to offer grants for rooftop solar photovoltaic systems of 20 kilowatts or smaller.

The renewable energy generation, which Avista says comes primarily from the Stateline Wind Energy

Center, is represented by renewable energy certificates (RECs, or "green tags"). Avista reports that in 2013, approximately 3,500 customers purchased nearly 227,000 blocks, representing 68,000 MWh.

In exchange for grants to finance some or all of a solar PV system, recipients "would agree to allow their installation to be made available for the education of its building occupants and members of the community." A priority for grants would be school districts and buildings "where the visibility of the installation will have the greatest impact for both educational purposes as well as solar energy generation." So the grant program is a win-win: Avista and its grant recipients will help promote solar power, and net-metered recipients also benefit from the financial value of the new solar generation through lower power bills.

The Alliance agrees with Avista that another benefit from the program will be to help the utility better understand how additional solar power fits into its overall system. "Additional program benefits may include the increased availability and potential reduced cost of solar equipment, as well as providing a utility experience with the installation of small scale distributed generation on a potentially diverse group of buildings and geographic locations in Idaho and Washington."

The Alliance is a strong advocate of additional renewable energy and energy efficiency acquisitions by Idaho's regulated electric utilities. Inasmuch as this proposal would assist Avista's efforts to publicize renewable energy and add more renewable energy to its portfolio, we are grateful that Avista developed such an innovative program that will help advance the 2012 Idaho Energy Plan's stated goals of promoting renewable energy in its diverse forms.

The Alliance once again appreciates the opportunity to recommend approval of Avista's application.

Respectfully submitted,

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