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IDAHO PUBLIC  
UTILITIES COMMISSION

**Chas. F. McDevitt**  
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June 17, 2013

*Via Hand Delivery*

Jean Jewell, Secretary  
Idaho Public Utilities Commission  
472 W. Washington St.  
Boise, Idaho 83720

**Re: Case No: IPC-E-12-27**  
Idaho Clean Energy Association Inc.

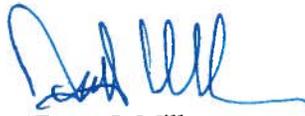
Dear Ms. Jewell:

Enclosed for filing in the above matter, please find an original and seven (7) copies of Idaho Clean Energy Association Inc's Petition for Intervenor Funding, Affidavit of Dean J. Miller and Affidavit of Leif Elgethun.

Kindly return a file stamped copy to me.

Very Truly Yours,

McDevitt & Miller LLP



Dean J. Miller

DJM/hh  
Enclosures

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IDAHO PUBLIC  
UTILITIES COMMISSION

*Attorney for Idaho Clean Energy Association Inc.*

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE  
APPLICATION OF IDAHO POWER  
COMPANY FOR AUTHORITY TO  
MODIFY ITS NET METERING  
SERVICE AND TO INCREASE THE  
GENERATION CAPACITY LIMIT

**Case No. IPC-E-12-27**

**IDAHO CLEAN ENERGY  
ASSOCIATION'S PETITION FOR  
INTERVENOR FUNDING**

COMES NOW the Idaho Clean Energy Association Inc., (ICEA) and pursuant to RP 161 *et. Seq.*, petitions for an award of intervenor funding and in support thereof respectfully shows as follows, to wit:

1. **List of Expenses.** As required by RP 162.01 attached is an itemized list of expenses that ICEA requests to recover, broken down into categories of legal fees, and out of pocket expenses.
2. **Statement of Proposed Findings.** The recommendations that ICEA wishes the Commission to adopt, as set forth in the Direct Testimony of Leif Elgethun, Pgs.10-11, are as follows:

- Maintain the current rate structure for net meter service and reject the Company's proposed rate structure because it is arbitrary, discriminatory and punitive;
- Reject the Company's proposal for a system cap on the meter metering program because the Company has not demonstrated a reliability or economic need for a cap and because a cap introduces uncertainty into the system;
- Reject the Company's proposal to forfeit net excess generation at the end of a customer's December billing period and adopt instead ICEA's proposal which would:
  - Place a financial, not kWh, value on excess generation;
  - Allow excess generation to be carried forward indefinitely (preferred) or for a three year period (acceptable);
  - Allow a customer to transfer any excess generation credits to IPCo in return for a payment based on then current avoided cost at any time;
  - If a period is set, then the Company shall automatically transfer all expiring excess generation credits to IPCo in return for a payment based on then current avoided cost.
  - Accept the Company's proposed modified interconnection rules negotiated with input from the ICEA.

3. **Statement Showing Costs.** See the Affidavits of Dean J. Miller and Leif Elgethun, filed herewith.

4. **Explanation of Cost Statement.** See the Affidavit of Leif Elgethun, filed herewith.

5. **Statement of Difference.** ICEA proposed elimination of a system cap on net metered generation while Staff supported a cap. Additionally, ICEA presented the perspective of businesses engaged renewable energy applications, a perspective unavailable to Staff. (See Direct Testimony of Dunay and Elgethun). Further, ICEA presented technical analysis showing that a separate rate class for net meter customers is unwarranted, and that the proposed rate structure is inequitable in several respects, and in particular the adverse impacts on customers whose usage is below average. (See Direct Testimony of White).

6. **Statement of Recommendation:** As reflected by the unprecedented amount of public comments filed in the proceeding, ICEA's advocacy addressed issues of concern to present and future net meter customers and of concern to businesses that provide service to net meter customers.

7. **Statement Showing Class of Customers.** Present and future net meter customers affected by the proceeding are members of the residential and small commercial classes.

**WHEREFORE** ICEA respectfully requests that this petition be granted.

DATED this 17 day of June, 2013.

IDAHO CLEAN ENERGY ASSOCIATION INC.

By:   
\_\_\_\_\_  
Dean J. Miller  
*Attorney for Idaho Clean Energy Association Inc.*

## CERTIFICATE OF SERVICE

I hereby certify that on the 17<sup>th</sup> day of June, 2013, I caused to be served, via the method(s) indicated below, true and correct copies of the foregoing document, upon:

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BY: Heather Houle  
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