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IDAHO PUBLIC
UTILITIES COMMISSION

Attorneys for Pioneer Power

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER) **CASE NO. IPC-E-12-27**
COMPANY'S APPLICATION FOR)
AUTHORITY TO MODIFY ITS NET) COMMENTS OF PIONEER POWER
METERING SERVICE AND TO) ON RECONSIDERATION
INCREASE THE GENERATION)
CAPACITY LIMIT)

Pursuant to Order No. 32880 issued by the Idaho Public Utilities Commission

("Commission") issued on August 14, 2013, in the above captioned docket Pioneer Power

("Pioneer") hereby submits its Comments on Reconsideration.

The Commission granted reconsideration on the following question:

If a net metering customer takes service through multiple meters at one or more premises, should the customer be allowed to apply net metering credits to offset usage on the other meters? If so, what conditions should apply?

Order No. 32880 p. 5. The Commission explained that:

Certain Petitioners asked us to reconsider and/or clarify whether a customer only can apply excess net energy credits to offset usage at the customer's net metering site, or whether the customer can apply the credits to offset usage at all sites. *See* Standal Petition; *see also* July 19, 2013 Comment by Don Campbell.

Id. Pioneer appreciates the Commission's willingness to formally reconsider its decision and urges it to allow off-site premises to benefit from excess energy credits from a net metering

customer's net metering project.

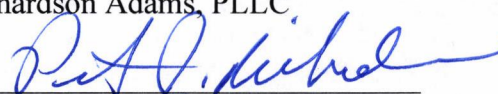
Allowing the transfer of excess credits from the net metering site to other accounts held by the same entity would be especially helpful for net metering customers like Pioneer. This is because most irrigation customers, like Pioneer Power, have pumps at several different locations most of which are separately metered and billed. It would also benefit residential customers with a separately metered shop or a second home. It does not seem logical to allow net meter credits to accumulate indefinitely if they are not usable at the location of the generation equipment.

Net metering credits represent an energy only product. Therefore inter-class transfer of the credits should not be a problem. The Commission should also allow transfer to a customer's other accounts on a different tariff schedule. Hence, an irrigation net metering customer should be allowed to transfer credits to the owner's residence or small commercial accounts.

RESPECTFULLY SUBMITTED this 30TH day of September 2013

Richardson Adams, PLLC

By



Peter J. Richardson
Pioneer Power