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IDAHO PUBLIC  
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

<b>IN THE MATTER OF IDAHO POWER</b>	)	<b>CASE NO. IPC-E-16-14</b>
<b>COMPANY'S APPLICATION FOR</b>	)	
<b>APPROVAL OF NEW TARIFF</b>	)	<b>THE IDAHO CONSERVATION</b>
<b>SCHEDULE 63, A COMMUNITY</b>	)	<b>LEAGUE COMMENTS ON THE</b>
<b>SOLAR PILOT PROGRAM.</b>	)	<b>STIPULATED SETTLEMENT</b>

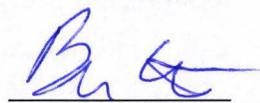
The Idaho Conservation League (ICL) recommends the Commission approve the stipulation for the Community Solar pilot project. This agreement represents a collaborative solution that will provide a voluntary program for some customers to meet their desire for clean energy while not unduly impacting other customers. In our initial comments in this case ICL identified two major aspects of Idaho Power's proposal that deserved further attention: the method for paying the subscription fee and the value of the solar energy credits. After negotiating with all parties, ICL supports the changes to these issues captured by the settlement stipulation. These changes work hand in hand to reduce barriers to potential subscribers while continuing to hold non-subscribers indifferent. Accordingly, ICL wholeheartedly supports the Community Solar Project and looks forward to encouraging Idaho Power customers to subscribe to the project.

The first issue ICL was concerned with was Idaho Power's proposal to require upfront, lump sum payments for subscriptions. Based on our research into the economic condition of most Idaho families, we were concerned that requiring subscribers to pay up front \$740 for an asset with a 25-year life would inhibit fully subscribing the project. ICL appreciates the monthly payment plan devised by the parties though the negotiations. Providing an option for 24 monthly payments better aligns with the financial situation of most Idahoans. Because subscribers who elect the monthly payment plan will cover the financing costs, this provision serves the public interest by enabling potential subscribers while holding non-subscribers harmless.

ICL was also concerned with Idaho Power's proposed valuation of the solar energy credits produced by the project. Through negotiation, ICL now supports the methodology used to value the solar output embodied in the stipulation. We agree the solar energy credits on a subscriber's bill will reflect the embedded cost of energy. This provides a valuable hedge for subscribers against rising power costs. We also agree that part of the value of the solar output is rolled forward and used to reduce the subscription costs. This portion of the value represents the long-term benefits that accrue from investing today in an alternate resource. Just as investing in Demand Side Management resources today delivers long-term benefits, investing today in a long-lived solar subscription delivers long-term benefits to the system.

In sum, ICL supports the Community Solar Project as refined by the stipulation in this case. We appreciate Idaho Power's initial proposal, and the compromises reached by all parties through the negotiation process. The public interest is served by the project as improved by the stipulation, because Community Solar provides some customers an option to meet changing energy desires without negatively impacting other customers. ICL urges the Commission to approve the stipulation.

Respectfully submitted this 18<sup>th</sup> day of October 2016



Benjamin J. Otto  
*Idaho Conservation League*

CERTIFICATE OF SERVICE

I,  certify that on this 18<sup>th</sup> day of October, 2016, I delivered true and correct copies of the foregoing COMMENTS to the following:

Hand delivery:

Jean Jewell  
Commission Secretary  
Idaho Public Utilities Commission  
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(Original and 7 copies provided)

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