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IDAHO PUBLIC  
UTILITIES COMMISSION

October 18, 2016

Idaho Public Utilities Commission  
472 W Washington St  
Boise, Idaho 83702

**Re: Comments on Idaho Power Company's Application to Approve New Tariff Schedule 63, A  
Community Solar Pilot Program IPC-E-16-14**

Dear Commissioners,

Thank you for the opportunity to provide comment on the revised proposal for Idaho Power Company's Community Solar Pilot Project.

We appreciate Idaho Power Company for working with the Sierra Club and other stakeholders to advance a pilot project to expand energy choices to customers.

Community solar is taking off as electric utilities seek to address changing customer preferences, gain experience with operating solar, take advantage of optimizing the benefits of distributed generation resources within their service territory, improve distribution system resilience and reliability within the load zone, hedge against fuel price volatility, reduce carbon emissions, and invest more energy dollars into local economies.

During the recent settlement discussions, diverse stakeholders worked together to improve the initial pilot offering to (1) expand opportunities for customer participation by lowering the upfront subscription fee and providing a monthly payment option, and (2) improve the methodology used to value solar generation.

Sierra Club enthusiastically supports the proposed Community Solar Pilot Project outlined in the Settlement Stipulation as a launching point for community solar in Idaho. We believe the revised proposal is in the public interest as it addresses changing customer preferences and represents a valuable opportunity for Idaho Power Company to learn about benefits that can be offered by clean distributed energy resources located throughout their service territory. A successful first pilot project will open the door for additional community solar to be developed strategically and incrementally (as needed) within the service territory. We believe community solar is a valuable opportunity for utilities to explore how solar, and other distributed energy resources, can help improve power quality, grid resilience, and defer or eliminate other investments in the distribution system.

**Community Solar Addresses Changing Customer Preferences**



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We believe the proposed community solar pilot is in the public interest as it expands customer choice. Demand for clean energy is rising in Idaho as customers seek to realize the numerous benefits offered by clean distributed energy resources. Net metering is growing fast and solarize programs in the Treasure Valley and Blaine have been met with significant interest. Major energy consumers in Idaho Power's service territory increasingly prioritize clean energy acquisition, including the City of Boise, Boise State University, Hewlett-Packard (which recently adopted a 100% clean energy goal), and others.

As demand for clean energy grows, electric utilities around the country are increasingly offering community solar choices to customers. According to a recent survey conducted by SEPA, 89% of electric utilities currently or are actively considering/planning for community solar product offerings. Last year the number of community solar programs in the U.S. increased by 80%, and this year another 79 programs are scheduled to come online.

This pilot project can help meet the growing demand for clean energy in the marketplace by providing additional clean energy choices.

### **Community Solar Facilitates Valuable Learning**

Rapid technology change is transforming the electric utility industry. Community solar is a vehicle to explore challenges and opportunities presented by the proliferation of cost-competitive distributed energy resources. Significant uptake in the use of DERs, such as small and medium scale PV solar, warrant electric utilities expanding their knowledge on how distributed generation can affect grid resilience and power quality.

As mentioned above, one of the fundamental benefits of solar PV is that it can be sited incrementally and strategically within the service territory. In the past, traditional large-scale thermal generation was necessarily site constrained, often located far from the load that generation would serve. This rendered a vast and expensive network of transmission and distribution wires that today account for the majority of Idaho Power's rate-based investments. Community solar is an opportunity for Idaho Power to explore how DERs can help defer, reduce, or eliminate investments in additional poles, wires, and transformers.

The proposed pilot is a valuable opportunity to begin exploring utility-private party arrangements as a first step in exploring how private capital can be leveraged for public good and utility planning. For example, additional community solar offerings might be developed on big-box stores at strategic locations.

These are just a few of the areas that warrant research into how DERs are changing the traditional electric utility landscape.

### **Conclusion**



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**Conclusion**

We believe the proposed Community Solar Pilot Project is a win-win for Idaho Power Company, customers, and our climate/environment, and local economies. The experience IPC will gain from this pilot project will be a benefit to all customers. We appreciate Idaho Power Company's working with diverse stakeholders to advance mutual interests.

Thank you for the opportunity to comment on this excellent proposal.

Sincerely,

Zack Waterman, Director  
Idaho Chapter of the Sierra Club

Cc: Michael Heckler



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CLUB**

**CERTIFICATE OF SERVICE**

I, *[Signature]*, certify that on this 18th day of October 2016, I delivered true and correct copies of the foregoing COMMENTS to the following:

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