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October 18, 2016

To: Idaho Public Utilities Commission

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

Re: Snake River Alliance Comments In the Matter of Idaho Power Company's Application to Approve New Tariff Schedule 63, a Community Solar Pilot Program.

Case: IPC-E-16-14

Dear Commissioners,

On behalf of the Snake River Alliance, its Board of Directors, and its members in Idaho Power Company's service territory, we appreciate this opportunity to comment on the above-referenced case. These comments are submitted pursuant to the Commission's Notice of Settlement Stipulation and Notice of Comment Deadline, Order No. 33616.

As a party in this case and a participant in the Settlement Stipulation to modify Schedule 63 (Community Solar Pilot Program) as proposed in the Company's Application, the Alliance reiterates its support of the Stipulation and offers the following comments:

The Snake River Alliance is a long-standing advocate of solar energy and its adoption by Idaho's electric utilities and their customers. Our efforts to expand solar power in Idaho include our successful sponsorship of the "Solarize the Treasure Valley" campaign to facilitate greater solar PV participation by identifying and introducing potential residential and commercial solar PV clients to solar PV installers in Southwest Idaho and adding significant amounts of new rooftop solar PV generation onto Idaho Power's grid.

We believe the Company's proposal is a reasonable *beginning* for what all acknowledge is a complex discussion of how to craft a community solar project that is most affordable and accessible to all eligible Idaho Power customers eager to participate in this pilot project, while simultaneously advancing the larger goal of greater solar power integration into Idaho Power's system.

It is clear that those participating in and commenting on this case share the goal of developing a program accessible to customers who for various reasons cannot or do not avail themselves of other clean energy resources such as net-metered rooftop solar PV. Judging by the successes shown by similarly situated utilities nationwide that have already produced community solar programs, it is also clear that a carefully crafted Idaho Power community solar program should be attractive to customers who, as Idaho Power states, desire access to clean solar power.

We are pleased that Parties in this case were able to satisfactorily craft a Settlement Stipulation that address Parties' concerns regarding such issues as calculation of the program's solar energy credit; its subscription fee and payment terms; and the Company's cost recovery. We commend Idaho Power for its flexibility and willingness to hear suggestions about the program's design. The billing and payment options reflect a good compromise of the various proposals presented by Parties.

As the Alliance asserted in its Sept. 1 comments to the Commission, we remain concerned about the lack of access to this program by Idaho Power's low and fixed-income customers. We reiterate here the concerns we raised in those comments:

> *Inasmuch as the ability to afford participation in a community solar pilot project is central to this application, we encourage stakeholders to more creatively explore avenues to include Idaho Power customers on low or fixed incomes to participate in the pilot. Such mechanisms have been identified in community solar programs elsewhere, and we believe the success of this program requires a similar effort. Idaho Power should be commended for staking a 15 percent share of this pilot from its shareholders, and that could be one source of funds for a low-income "carve-out" of sorts to enable certain customers who might not otherwise be able to participate to do so. For example, Oregon has considered sequestering 10 percent of the generating capacity from community solar projects to benefit low and fixed-income customers....*

We also stated in our comments:

> *The George Washington University Solar Institute explored this issue in depth in 2014 [http://solar.qwu.edu/research/state-policies-increase-low-income-communities0/0E2y080y099- access-solar-power) and among its key take-aways:*
>
> *Low-income households in the US spend a higher percentage of household income on energy. Solar power could reduce the energy burden of low-income households by providing electricity that is less than what utilities charge.*
>
> *Low-income households face several barriers to going solar, including: difficulty meeting credit requirements for financing or leasing, status as a renter, and inability to benefit from tax credits or other incentive programs.*

California has several successful programs and initiatives designed to support solar deployment to low-income families. The California Solar Initiative [CS) sets aside $216 million to support the Single-Family Affordable Solar Housing (SASH) and Multifamily Affordable Housing (MASH) that subsidize solar systems for low-income households. California also used LIHEAP funds to help support solar installations for LIHEAP eligible families.

Louisiana lacks public support and finance for low-income solar programs, but leasing company PosiGen has developed a model that leverages state tax credits and secures financing on community redevelopment terms.

Colorado's 2010 Community Solar Gardens (CSG) Act allow homeowners who without a suitable roof or space to purchase shares of a solar installation. The Act requires that at least 5 percent of the electricity from the CSG be reserved for low-income families in order to qualify for solar renewable energy credits [SRECs).

California, Louisiana, and Colorado's low-income solar policies and programs can serve as models that can be replicated in other states.

We acknowledge the Commission is not bound to address concerns and challenges facing Idaho's low-income and fixed-income communities, and in today's regulatory framework in Idaho, neither is Idaho Power. However, we remind the Commission and Idaho Power that most states that have adopted community solar programs have also identified means to allow *all* utility customers, including if not especially those of limited means, to participate in those programs. This pilot program should be no different, and sequestering the funds for such participation, as identified anecdotally above, is both achievable and desirable. Otherwise, we continue to run the risk of solar power, which is sought by all customers, only being available to those in higher income brackets.

The Alliance believes that clean, affordable, and environmentally responsible electricity should be equally available to all utility customers and not be treated as a "boutique" energy resource. Idaho has the regulatory authority to ensure equal access to this clean energy resource by all classes of utility customers and to make such access affordable to all – and we believe such authority should be exercised in this case and reflected in the Commission's order approving this settlement stipulation. We urge the Commission to direct in its order that Idaho Power acknowledge and address the needs and desires of all of its customers, regardless of their income levels, aspiring to participate in this program.

Conclusion

As stated in our Sept. 1 comments to the Commission, we agree with Idaho Power that utility customers who choose not to participate in the program should not have undue costs shifted onto them from those who do participate. However, we do not believe such a cost-shifting threat exists in this community solar pilot project, and we believe this community solar program has the

potential to deliver real benefits to all customers regardless of their participation in the program. There are known and provable system-wide benefits that a community solar program delivers to all customers, including the delivery of capacity-valued power to the system during times of highest demand and a lowered need for other, marginal, resources.

In addition, we believe that this Settlement Stipulation, as well as the Alliance's recommendations to the Commission regarding solar power accessibility to varied income groups, furthers the objectives of the 2007 and 2012 Idaho Energy Plans as adopted by the Idaho Legislature.

The Snake River Alliance appreciates this opportunity to comment on IPC-E-16-14 and the dedication by all parties to reach this settlement stipulation. We look forward to seeing a successful completion of this pilot program for all interested in participating.

Respectfully submitted,

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