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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION OF THE IDAHO DEPARTMENT OF ADMINISTRATION FOR AN EXEMPTION FROM THE IDAHO PUBLIC UTILITIES COMMISSION'S MASTER METERING RULES FOR ELECTRIC UTILITIES AND THE IDAHO POWER MASTER METERING STANDARDS.	**CASE NO. IPC-E-18-08** **COMMENTS OF THE COMMISSION STAFF**

The Staff of the Idaho Public Utilities Commission, through counsel, comments as follows on Idaho Department of Administration's (IDOA) Petition for an Exemption to the Idaho Public Utilities Commission's Master Metering Rules for Electric Utilities and the Idaho Power Master Metering Standards (the Petition).

BACKGROUND

On April 13, 2018, the IDOA petitioned the Commission for an exemption from the Commission's Master Metering Rules for Electric Utilities (IDAPA 31.26.01) for the State of Idaho's Chinden Office Complex (the "Campus"), which was recently purchased from HP Inc., formerly known as Hewlett Packard Company. IDOA also seeks a corresponding waiver of Idaho Power Company's Master Metering Standards in Rule E to Tariff No. 101.

THE MASTER METERING RULES AND STANDARDS

Commission Master Metering Rule 103 (IDAPA 31.26.01.103) states:

> No unit of commercial buildings and shopping centers shall be master-metered for electric service after July 1, 1980, if the units for their tenants contain an electric space heating, water heating, or air-conditioning (space cooling) unit that is not centrally controlled and over which the unit's tenants individually control electric usage. Tenants in otherwise master-metered buildings whose electric load or who operate appliances whose electric load exceeds the individual metering threshold found in the utility's tariffs must be individually metered.

Idaho Power's master metering standard in Section 4 of Rule E to Tariff No. 110 is nearly identical to the Commission Master Metering Rule 103. Both the standard and rule require utilities to individually meter commercial buildings where the tenants control their own electric space heating, water heating, or air-conditioning appliances.

IDOA has petitioned the Commission for an exemption to the master metering rule and standards as they relate to the state's recent purchase of the Campus from HP Inc.

The state leases more than 800,000 square feet of private property. Leases for about one third of that space will expire in the next five years. In 2017, the Idaho Legislature concluded it would be a wise use of taxpayer dollars for the state to buy the Campus—which consists of about 200 acres, eight separately numbered buildings, a cafeteria building, multiple outbuildings, a picnic shelter, trails, sports fields, and parking areas—for use as a single-destination complex for multiple state agencies that currently lease premises elsewhere. The state thus purchased the Campus from HP Inc. Petition at 2-4. Idaho Power provides electrical service to the Campus through a substation, and the electricity is then distributed through a network throughout the Campus to the different buildings and other structures. *Id.* at 3.

With the state's purchase of the Campus, the state also entered a Facilities Lease with the IDOA that requires IDOA to operate and maintain the Campus. In accordance with the state's purchase of the Campus from HP Inc., the IDOA also was required to lease back part of the Campus to HP Inc. HP Inc. was to be the sole tenant of Campus Buildings 1, 3, 5, and 7, the cafeteria building and certain connecting corridors and outbuildings serving these buildings. IDOA also was to assume HP Inc.'s existing leases with HP Inc.'s existing on-Campus tenants, including Hewlett Packard Enterprise Company (Building 4), Enterprise Services LLC (part of Building 2), and Sykes Enterprises, Incorporated (Building 8). IDOA also entered a new lease with another tenant, First Technology Federal Credit Union Boise, which had been serving HP Inc.'s employees at the Campus in part of Building 2 as part of a master lease with HP Inc. *Id.* at 4-6.

The IDOA's leases with the different on-Campus tenants expire as follows: HP Inc. has an initial term of seven years, and options to renew for two five-year terms; Hewlett Packard Enterprise Co. expires July 31, 2020; Enterprise Service LLC expires June 31, 2018; and Sykes Enterprises, Incorporated expires June 30, 2020, with two options to extend the term for five-year periods; and First Technology Credit Union expires March 31, 2019, with an option to extend to March 31, 2022. *Id.* at 4-5. IDOA maintains it has no authority to lease the Campus to any private entity outside of the existing leases at the Campus. Rather, the Campus will be used as a complex for state agencies. As the leases expire, state agencies will transition to the Campus. The Idaho State Tax Commission and Industrial Commission will move to Building 2 this year. *Id.* at 7. And, except for the small credit union suite, state agencies will fully occupy Campus Buildings 2, 4, and 6 by mid-2020. *Id.* at 5.

IDOA requests an exemption to the Commission's master metering rule and Idaho Power's corresponding standard so IDOA can install the HP Inc.-required sub-meters, require HP Inc. to pay the actual costs of its electric use, and otherwise facilitate the IDOA's ability to better operate and manage the Campus. *Id.* at 1-2, and 12. IDOA notes its lease with HP Inc. is consistent with the Commission's master metering rules because electric charges are transparent to HP Inc. and based on protocols developed by both parties; HP Inc.'s Supervisory Control and Data Acquisition (SCADA) system and audit process in the lease ensure HP Inc.'s electric costs are its actual costs; and HP Inc. has full control of its leased premises electric hot water systems, air systems, vacuum systems, and process water systems. IDOA states these provisions enable HP Inc. to control the efficiency of its electric use based on its actual use and business needs. *Id.* at 2 and 11.

STAFF ANALYSIS

Staff recommends the Commission authorize a limited exemption to Master Metering Rule IDAPA 31.26.01.103 and waive the requirements of Master Metering Standards Rule E from IPUC No. 19, Tariff No. 101 for the State of Idaho Chinden Office Campus as laid out in more detail below. Staff believes this is reasonable because the situation is temporary—no waiver will be needed when the Campus is either individually metered or wholly occupied by state agencies—and because the IDOA's proposal to sub-meter HP Inc. with SCADA will effectively preserve the price signal which master metering rules exist to protect. Staff recommends that these exemptions expire when the Campus buildings are individually metered,

upon termination of the existing leases for each Campus building, or when the Campus becomes wholly state occupied, whichever comes first.

Introduction

After the State of Idaho purchased the Campus, IDOA asked Idaho Power to manage the Campus through the Company's Rule M Facilities Charge Service. During meetings with Staff, IDOA indicated that Idaho Power's management of the State of Idaho's Capital Mall complex under a facilities charge agreement has worked well and that IDOA would like to establish a similar arrangement for the Campus.

When Idaho Power inspected the Campus to determine if it could provide facilities services, it determined that the Campus electric system does not use standard Idaho Power electric equipment or configurations. Because the Campus electric system is non-standard, Idaho Power does not have the equipment inventory or professional expertise to serve the Campus under a facilities charge arrangement.

In meetings with Staff, Idaho Power explained that the electrical distribution network connecting Buildings 1 through 7 is very complex, but functional. The Campus' Point of Delivery (POD) is the Idaho Power Substation on Cloverdale Road. The substation has two 12.5 KV feeders; one goes to Building 1 and the other goes to Building 8, which is individually metered. Buildings 1 through 7 are not individually metered. Instead, they are served through a centralized switching system in Building 1. In addition to Buildings 1 through 7 being interconnected rather than individually metered, the Campus includes five electric chillers that provide air conditioning to all eight buildings. Staff understands this unique configuration results from the Campus and its electric system being built and expanded behind Idaho Power's POD over thirty years to meet HP's specific needs.

After a series of inspections, Idaho Power informed IDOA that the Company could not serve the Campus under a facilities charge agreement unless significant investments were made to align the Campus with its standard equipment. Idaho Power also informed IDOA that because the Campus buildings are not owner-occupied (i.e., occupied by state agencies) and are not individually metered, the Campus would need a waiver from the Commission rules prohibiting mastering metering to maintain the existing leases. The IDOA then authorized Idaho Power to conduct a construction study to determine the necessary investment to make the Campus suitable

for a facilities charge agreement, and engaged Commission Staff about the procedure for obtaining of a waiver from the master metering rules.

History of Master Metering

In 1980, the Commission adopted Rules and Regulations Governing Master Metering of Electric Service (Master Metering Rules) by Order No. 15556. In its Order, the Commission stated that its decisions were based "not only on the conservation goals of [the Public Utility Regulatory Policies Act of 1978], but also upon goals of fostering and maintaining direct relations between electric utilities and their customers and of equitable treatment of the ultimate consumers of electricity".[1] The rules were based on four premises:

1. Individually metered tenants who are responsible for paying their own electric bills use less and waste less electricity than master-metered tenants …;
2. The ultimate consumers of electric energy are better served by a direct customer relationship with the utility than by disguising utility costs in the rent or by the landlord playing the role of the public utility …;
3. It is inequitable for electric consumers to pay more or less than the cost of electricity which they consume themselves …; and
4. The adoption of easily understood rules capable of immediate application without lengthy or costly studies or analyses is a better means of drawing reasonable lines allowing or disallowing master metering than rules based upon complex cost-benefit analyses that ignore unquantifiable benefits of individual metering. Order at 2.

Previous Master-Metering Waivers

Since adoption of the Commission's Master Metering Rules in 1980, the Commission has received six formal requests for exemption. Five were granted, and one was withdrawn before an order issued.

Five exemption requests involved new construction, three of which were for residential assisted living facilities. A fourth request involved a city-owned facility providing transitional

[1] Order No. 15556 at 1.

housing and efficiency apartments to the homeless and low-income communities. The fifth request was for a high-rise building with residential units and retail and office space.

In each case, the efficiency of the building and the ability for tenants to respond to the price signal was a factor in granting the waiver. The assisted living facilities and the low-income housing all included a host of energy efficiency measures. While residents of the assisted living facility controlled their own space heat, it was included as a part of their rent, so they would not have received a price signal even if they were individually metered. Residents of the homeless and low-income housing community do not pay for their housing or utilities, so they would not receive the price signal even if units were individually metered.

The high-rise mixed-use building met particularly high efficiency standards—it used 75% less energy than a comparably sized building. While the retail tenants of the building were individually metered, the Commission found that the extremely low energy use of the building dramatically decreased the need to send a price signal to the office space and residential unit occupants.

In several cases, the Commission found that the nature of the proposed facility in both design and operation "does not lend itself well to providing the conservation signals that would otherwise be provided through individual metering and billing."[2] In four cases, the Commission specified that the exemption applied only so long as the facility was used for its original purpose or a similar type facility.[3] In those same four cases, the Commission required that the buildings incorporate energy efficiency measures into the building design.

Only one exemption request involved an existing commercial property, which in that way is similar to the IDOA's request for the Campus. Idaho Power and Sinclair Oil, dba Sun Valley Company, requested a rule exemption in conjunction with approval of the sale and transfer of distribution facilities at the Sun Valley Resort. Sun Valley wanted to remove the meters and reconfigure the service line, so all 19 tenants in the mall area would be served under a master meter arrangement between Idaho Power and the Sun Valley Company. The cost of electricity would be incorporated into tenants' lease rates. The Commission approved the waiver because its scope was limited and only 4 of the 19 tenants were paying Idaho Power directly for their usage even when they were individually metered.

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[2] *See* Case No. IPC-E-96-07, Order No 26451.
[3] *See* Case No. IPC-E-91-21, Order No. 23936; Case No. GNR-E-94-01, Order No. 102; Case No. IPC-E-96-07, Order No. 26451; and Case No. WWP-E-96-05, Order No. 26512.

The IDOA waiver request does not align closely with any of the previously granted waivers. However, the IDOA's situation differs from previous requests in one significant way: it is temporary. The Campus needs the waiver only until the Campus buildings are individually metered or wholly occupied by state agencies. Since IDOA intends to transition the entire Campus to state occupancy, Staff believes it is reasonable to recommend a limited waiver that would allow IDOA to honor its lease agreements and facilitate the transition to state occupancy. However, Staff also recommends that the waiver expire no later than when HP's final lease extension option ends in 2035 to ensure that the current situation is not later construed as a precedent that might encourage future petitioners to circumvent the master metering rules.

Existing Leases at the Campus

Campus buildings were not individually metered when HP owned the Campus, but HP did not require a waiver from master metering rules because HP and its related businesses occupied all of the buildings that were not individually metered (Buildings 1 through 7). Building 8, which is occupied by an unrelated entity, was separately metered when it was connected in 2013. However, when the state purchased the Campus in 2017, it agreed to temporarily maintain existing leases to HP and the other commercial tenants in buildings that are not individually metered. This arrangement is not consistent with the master metering rules and prompted IDOA to request a waiver.

The Campus currently has four non-state agency tenants in unmetered buildings. As the existing leases expire, the IDOA indicated that it plans to transition the Campus to state agencies. If the entire Campus were occupied by state agencies, no waiver would be necessary. However, the transition period to full state occupancy is very long. As shown in Table 1, some leases expire by or before 2020, others have options to extend until 2030, and HP Inc.'s lease can be extended until 2035.

The lease arrangement for HP Inc., which occupies over half the Campus, differs from the other assumed leases. The HP Inc. lease allows more flexibility to renew, with a seven-year initial term and two subsequent five-year renewal options. Although, the HP Inc. lease could continue for 17 years, it could also be terminated beginning in December of 2022. In addition, the HP Inc. lease requires the IDOA to provide utility separation, sub-metering or metering, and electric billing for the actual cost of electric service. Other tenants have the cost of utilities included in the monthly rent, similar to common commercial lease agreements.

Staff notes that IDOA could re-negotiate any of these leases beyond the currently identified dates. IDOA may have a particular incentive to extend the HP Inc. lease to keep HP located in Idaho. Besides extending the existing leases, IDOA could also rent space to non-state tenants. Renting space to anyone other than state agencies without individual metering would require a waiver.

Table 1: State of Idaho Chinden Campus Buildings, Tenants, and Leases (*Id.* at 5-6)

Building	Tenant	Lease Expiration	Renewal/ Extension	Additional Lease Options
1,3,5,7	HP Inc.	2025	2030, 2035	May terminate in 2022, Two five-year extensions
Cafeteria	HP Inc.	60 day notice		
2 (Shared)	Enterprise Services LLC	June 30, 2018		
	First Technology FCU	March 31, 2019	2022	One 3-year extension
4	Hewlett Packard Enterprise Company	July 31, 2020		
6	Vacant, will be State occupied			
8 (Individually metered)	Sykes Enterprises, Inc.	June 30, 2020	2025, 2030	Two five-year extensions

Sub-metering and Billing

State agencies and commercial tenants at the Campus, except HP Inc., operate under variations of a "full service" lease where electric charges are built into a base rent payment.[4] This type of lease is very common because it provides tenants with a predictable rent payment over the term of the lease and protects them from cost increases and month-to-month expense fluctuations. While the absence of a direct utility bill means the price signal is lost, Staff does not oppose this arrangement for state agencies because they are all part of the same broader organization. Additionally, Staff does not oppose this arrangement for the other Campus

[4] In Building 2, the First Technology Federal Credit Union, there is an "additional rent" component in the lease for after-hours HVAC charges. Hewlett Packard Enterprise Company, also in building 2, and Enterprise Services LLC in Building 4, have electric charges entirely built into a base rent payment. Sykes Enterprises in Building 8, has an "additional rent" component specified in their lease for excess energy use over a defined usage cap.

commercial tenants because it would likely exist even if the Campus buildings were individually metered.

While a full service lease worked for the other commercial tenants and state agencies, HP Inc. required that its lease include direct billing for its utility usage. HP Inc. believes this will allow it to comply with Internal Revenue Code requirements regarding the sale and lease-back of real property. In its original petition, IDOA proposed to separately sub-meter and bill HP Inc. for its electrical consumption by installing "electric meters at the service side of each transformer"[5] and bill electrical use "through the protocols for reading the sub-meters developed by the parties."[6]

But as the case progressed, IDOA learned that it could "duplicate the SCADA system server at the Campus, and then use that server to log electrical use."[7] This server would be owned by the IDOA and provide 6,320 analog inputs which would allow very precise metering of HP Inc.'s electric consumption.[8] This became IDOA's preferred option because it was the least expensive and provided the most detailed usage data, though it confirmed that installing either limited (8) or full (25) sub-meters to track usage were also possibilities.

Staff believes the SCADA server, perhaps combined with the other sub-metering options described by the IDOA, can provide a very robust price signal that preserves the intent of master metering rules. When coupled with the temporary situation, Staff believes these two factors are sufficient basis on which to grant a limited waiver.

While Staff believes that the temporary status and preservation of the price signal are critical to approving the waiver, Staff also points out that the price signal is only retained if IDOA's billing methodology aligns with Idaho Power's billing methodology for Schedule 19. That is not the case now, but Staff believes a feasible solution exists.

HP Inc. is being temporarily billed by IDOA for an allocated share of the cost of electricity based on square footage until its actual energy usage can be segregated and measured. Staff agrees with IDOA that this likely underbills HP Inc. for its electric use.[9] Staff understands

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[5] Production Response 2.
[6] Petition at 9.
[7] Production Response 2.
[8] The Campus SCADA server performs equipment and operations monitoring and receives/records data and operations information including current, load, voltage, temperatures, and equipment or process status. SCADA systems are used by electric utilities to collect, record, and monitor data used to manage the electric grid.
[9] Production Response 4.

that after HP Inc.'s electric use is segregated and measured, IDOA still intends to bill HP Inc. on an allocated basis, albeit a different one.

IDOA proposes to bill HP Inc. as follows: IDOA will determine what percentage of kilowatt hours HP Inc. uses in relation to the total kilowatt hours measured by Idaho Power at the primary meter. This percentage will be applied to the total billed amount reflected on Idaho Power's bill for the Campus. This simplified billing methodology uses only one bill determinate (kWh), but ignores demand, peak and off peak usage, and other components of Idaho Power's Schedule 19. Staff maintains that IDOA's methodology will not reflect actual usage and is likely to result in underbilling HP Inc. Staff believes that the sub-meters and/or the SCADA server will allow IDOA to derive all the billing determinants and therefore bill HP based on all the components of Schedule 19. This will avoid HP Inc. being subsidized by other Campus tenants, including state agencies, and produce the accurate bill that HP Inc. has requested.

Because the price signal is not retained and HP Inc. cannot be accurately billed until the IDOA billing aligns with utility billing, Staff recommends that the IDOA align its bill for HP Inc. with Schedule 19. Staff is willing to work with IDOA to align its billing methodology with Schedule 19. Staff recommends that when that process is complete, IDOA should submit a compliance filing to the Commission to confirm the billing input and methodology align with Schedule 19 and that the billing thereby most accurately retain the price signal. As pricing inputs change within the Schedule 19, Staff recommends that the IDOA update its pricing schedule. If this change is made, Staff believes the price signal will have been maintained and a temporary waiver is justified.

Idaho Power's Construction Studies

As mentioned, IDOA authorized Idaho Power to study the investments required to align the Campus with Idaho Power's electrical standards in order for the Company to enter into a facility services agreement to serve the Campus. Idaho Power conducted two versions of this study. Version 1 assumed that a master metering wavier was granted and Version 2 assumed that a waiver was not granted and therefore each Campus building needed to be individually metered. Under Idaho Power's facilities service charge arrangement, a customer can opt to have the Company own and operate the electrical equipment on its system for an ongoing monthly service fee. The ongoing monthly service is calculated based on 1.41% of the total investment and extends indefinitely, although customers have the option to buy out of the contract.

Idaho Power estimated that Version 1 would cost approximately $1,311,508. Version 1 would maintain the POD at the Cloverdale substation and provide the necessary configuration for Idaho Power to operate and maintain the Campus electric system through the Rule M facilities charge if a waiver is granted. The cost for Version 1 would be paid through an ongoing monthly facilities charge of $20,191.

Idaho Power estimated that Version 2 would cost approximately $1,728,822 with an ongoing monthly facilities charge of $11,812 for Idaho Power to operate and maintain the facilities beyond the POD. Version 2 would install a POD at each building and each chiller to establish a traditional metering arrangement that would not require a master metering waiver. The total cost for Version 2 includes two components: a) an upfront payment of $891,081 for distribution facilities under Rule H to individually serve each building;[10] and b) an ongoing monthly facilities charge of $11,812 to pay the $837,741 investment for Idaho Power to install facilities beyond the POD, which Idaho Power will then own and operate under the Rule M facilities charge.

Both Version 1 and Version 2 estimates included disclaimers about the complexities and unknowns that could not be precisely quantified and further cautioned that contingencies, which can be as high as 30%, were not included. The Company also pointed out that contractors' bids could escalate substantially from this estimate.

Staff notes that the IDOA originally believed that a waiver was necessary to save taxpayers the expense of individual metering. However, the bulk of the expense comes from the investment required to align the Campus with Idaho Power electric standards so the Company can provide facilities services. The Version 2 estimate, which does not require the waiver, is about $417,000 more than Version 1 in total cost estimate.

However, the actual expense to the state, and ultimately taxpayers, is more accurately reflected in the monthly facility costs. The monthly facilities charge for Version 1 is almost double the monthly facilities charge for Version 2. Since the state will be responsible for covering the facilities charge indefinitely, the smaller facilities charge under Version 2 will save taxpayers money over the long term.

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[10] Version 2 stated that a 19% tax gross-up rate would apply to Rule H work exceeding $1,000,000.

Table 2: Idaho Power Construction Studies

Idaho Power Construction Study	Total Cost Estimate	Line Extension (one-time)	Monthly Facilities Charge	Total Payments		
				10 years	20 years	30 years
Version 1	$1,311,508	$0	$20,191	$2.4 million	$4.8 million	$7.2 million
Version 2	$1,728,822	$891,081	$11,812	$2.3 million	$3.7 million	$5.1 million

Version 2 allows Idaho Power to serve the Campus through a facilities charge at a lower total expense to taxpayers. In addition, it only requires a waiver until construction is completed (54 weeks from the start date), significantly less than the 17-year waiver for Version 1. Individually metering the Campus buildings would also provide the IDOA more flexibility for future use of Campus buildings.

Staff notes that one of the benefits of individual metering buildings is that it could provide better price signals to tenants even if the state wishes to continue its practice of bundling electricity costs into rent. Individual metering would enable IDOA to calculate rent for each tenant based on actual electric usage of the building the tenant occupies, rather than simply factoring in a proportional share of the aggregate usage of the Campus.

RECOMMENDATION

In accordance with Commission rules, Staff prefers direct metering when possible. However, because the IDOA intends to transition the entire Campus to state occupancy and its proposal to sub-meter with SCADA combined with Schedule 19 billing preserves the price signal which underpins master metering rules, Staff believes it is reasonable to recommend a waiver that would allow the IDOA to honor its interim lease agreements and facilitate the transition to either individual metering or state occupancy. But to prevent future parties from using this rationale to broadly circumvent master metering rules, Staff recommends the waiver be granted with these limitations:

1. The waiver will expire when the Campus is individually metered, becomes wholly occupied by State agencies, or when the existing lease extensions expire in 2035, whichever is earliest;

2. The price signal associated with direct metering should be preserved by requiring IDOA to make a compliance filing confirming the final Campus sub-metering method and demonstrating that its calculations and billing methodology for HP Inc. aligns with Schedule 19; and
3. The waiver should remain in effect only as long as the facility maintains similar use as that under which it was granted.

Respectfully submitted this 5th day of July 2018.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 5th DAY OF JULY 2018, SERVED THE FOREGOING **COMMENTS OF THE COMISSION STAFF,** IN CASE NO. IPC-E-18-08, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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