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IDAHO PUBLIC  
UTILITIES COMMISSION

Express mail address:  
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**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE PETITION )  
OF NW ENERGY COALITION AND )  
RENEWABLE NORTHWEST PROJECT )  
TO ESTABLISH NET METERING )  
SCHEDULES FOR PACIFICORP. )  
\_\_\_\_\_ )

Case No.

*PAC-E-03-04*

**NEW CASE**

**PETITION**

Pursuant to Rules of Procedure 33 and 53, IDAPA 31.01.01.033 and .053, NW Energy Coalition and Renewable Northwest Project hereby petition the Idaho Public Utilities Commission to initiate appropriate proceedings for the establishment of new net metering schedule(s) for PacifiCorp dba Utah Power & Light Company addressing (1) procedures, requirements, and standards for the interconnection and operation of small renewable electric generation systems by electric customers of PacifiCorp; and (2) related provisions for billing such customers for the net of their electric consumption less their generation.

Petitioner **NW Energy Coalition** is a non-profit organization incorporated in Washington, which promotes energy conservation and renewable energy resources, consumer and low-income protection, and fish and wildlife restoration on the Columbia and Snake Rivers. In Idaho, the Coalition has twelve (12) member organizations,

including Idaho Rural Council, Idaho Rivers United, and the Idaho Community Action Association.

Petitioner **Renewable Northwest Project** is a non-profit organization incorporated in Oregon, which promotes development of renewable energy sources, including wind, solar, and geothermal technologies in Idaho, Oregon, Washington and Montana.

This Petition is supported by the following points and authorities; and by the direct testimony of Sonja Ling.

### **SUPPORTING POINTS AND AUTHORITIES**

The foregoing Petition seeks to correct an imbalance of opportunity between customers of Idaho's three major investor-owned utilities in their ability to install small electric generation systems on their property and generate all or a portion of their electric needs, while remaining interconnected with the electric grid. This concept – “net metering” – is a means for customers to seek out their own energy solutions, while also enhancing the diversity and reliability of the electric grid through clean distributed energy generation to the benefit of all customers.

The Commission has recently approved net metering schedules for Idaho Power Company (under Schedule 84) and Avista (under Schedule 62). Since approval of Idaho Power's new Schedule 84 on February 13, 2002, the total number of net metering customers in Idaho Power's service territory has grown sharply from three (3) individuals to eleven (11). Although still few in number, this represents a large increase from the number of individuals net metering under the prior IPC Schedule 86 protocols; and Petitioners believe this growth will continue to the advantage of all IPC customers.

However, PacifiCorp has no approved schedule to regulate net metering. While customers of PacifiCorp presumably could negotiate with the Company on a case-by-case basis to install small renewable generation systems and receive payment for their generation under PURPA, these customers are at a disadvantage to similarly situated customers of Idaho Power and Avista. Specifically, customers of PacifiCorp have no assurance of what type of systems they could install, what interconnection requirements will be required of them, and what rate they might be credited for electricity they generate.

Petitioners believe that the new Schedule 84 for Idaho Power Company represents a good model for PacifiCorp in many respects, including the size of systems permitted for net metering.<sup>1</sup> Although Avista's Schedule 62 offers essentially the same opportunities to residential and small commercial customers as under the Idaho Power schedule, irrigation customers and other large customers of Avista are at a disadvantage due to the 25 KW capacity limitation for net metered generation systems. As the Commission found in recent proceedings over the establishment of a new net metering schedule and revised interconnection schedule for Idaho Power Company "all customers should be provided the opportunity to participate in net metering, including three-phase systems and demand metered customers." Order No. 28951 at 11; see also Order No. 29094 (approving 100 kW nameplate capacity limitation for large commercial and irrigation customers of Idaho Power).

Petitioners assert that the customer profile of PacifiCorp's territory (with its high irrigation loads) demands that a higher capacity limit be provided to large commercial

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<sup>1</sup> However, as discussed below, Petitioners are concerned that the billing methodology under IPC's Schedule 84 are not advantageous for irrigation customers.

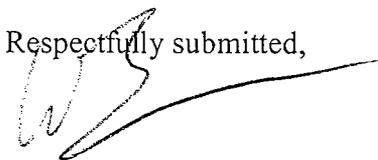
and irrigation customers, as with Idaho Power's Schedule 84. However, as Petitioners discussed in commenting on Idaho Power's proposed amendments to Schedule 84 (Case No. IPC-E-02-4), a billing methodology that credits excess monthly generation at the customer's retail rate on a per kWh basis, and allows for a continuous carry-over of such credits, would best encourage net metering. We request the Commission invite further comment on this issue from the irrigation community in considering net metering for PacifiCorp.

### CONCLUSION

Petitioners respectfully request that the foregoing Petition be GRANTED and that the Commission initiate such proceedings as necessary to establish new net metering protocols for PacifiCorp.

Dated: February 27, 2003

Respectfully submitted,



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William M. Eddie  
On behalf of NW Energy Coalition  
and Renewable Northwest Project

## CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of February 2003, I caused true and correct copies of the foregoing PETITION and DIRECT TESTIMONY OF SONJA LING to be served on the persons listed below via the method of service noted:

### Via Hand Delivery

Commission Secretary  
Idaho Public Utilities Commission  
472 W. Washington St.  
Boise, ID 83702-5983

Mary Hobson  
Stoel Rives  
101 S. Capitol Blvd., Suite 1900  
Boise, ID 83702

### Via U.S. Mail

John Eriksson  
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