



27 July 2020

Oregon Public Utility Commission

SUBJ: IDAHO POWER COMPANY TARIFF ADVICE NO.20-07 / SCHEDULE 101 COMMUNITY SOLAR PROGRAM

To Whom It May Concern,

Fleet Development wishes to reiterate its concerns about the impact of Idaho Power Company's community solar program tariff filing. Due to the absurdly small size of Idaho Power's initial community solar tranche of 3.28 MW, the utility's entire administrative program costs will be borne by a single project creating a regressive fiscal effect for the only community solar project in the company's territory. The requested utility administration cost is approximately 400% higher than other utilities in the program are requesting. This fee is equal to \$743,400 extracted from the single 2.95 MW project over 20-years. That cost, in conjunction with other programmatic overhead and a lower bill credit rate in Idaho Power's territory, creates an environment that is unintentionally prohibitive to community solar.

Although the utility admin fee is billed as an additional subscriber fee, the project manager must effectively subtract this fee from subscription rates because subscribers naturally expect to purchase subscriptions that are at least cost-neutral or discounted (20% discounted for low-income) compared to their existing energy costs.

Idaho Power's Initial Program Capacity allotment is only 3.28 MW and with solar projects capped at 3 MW, Idaho Power's program costs will be billed to a single project, with no way to mitigate it. We respectfully suggest that the proposed Idaho Power utility admin fee (~\$41,000/year across its allocation, extracted from only a few MW of community solar) **will neither fully offset actual incurred utility costs nor create a financially feasible scenario in which community solar projects of any size can be developed.** Without community solar projects, the utility will recover none of the cost of their mandated billing adjustments.

Potential Solutions

- 1) Match the utility admin fee charged by other utilities participating in the program.
- 2) Match the bill credit rate of other utilities participating in the program.

Either method provides Idaho Power opportunity to recapture reasonable billing update costs, while removing unproportionate fees that will kill the community solar projects that are Idaho Power's only potential cost recovery mechanism for this programmatically mandated expense.

Respectfully,

*Ryan Sheehy*

Fleet Development

