



LISA F. RACKNER
Direct (503) 595-3925
lisa@mrg-law.com

October 18, 2018

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Filing Center
201 High Street SE, Suite 100
Salem, Oregon 97301

Re: Docket UM _____
In the Matter of Idaho Power Company's Request for Authorization for
Deferred Accounting of Solar Photovoltaic Pilot Program Revenues and
Expenditures

Attention Filing Center:

Enclosed for filing is an electronic copy of Idaho Power Company's Application for Deferred Accounting of Solar Photovoltaic Pilot Program Revenues and Expenditures. The Notice of Application for Deferred Accounting of Solar Photovoltaic Pilot Program Revenues and Expenditures is attached to the Application as Attachment A. The Application and Notice have been served on the parties of Idaho Power Company's last general rate case.

The Application was prepared in consultation with the Oregon Public Utility Commission Senior Revenue Requirements Analyst Mitch Moore. If you have any questions, please do not hesitate to contact me or Senior Regulatory Analyst Courtney Waites at (208) 388-5612.

Sincerely,

Lisa F. Rackner

Attachments

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM _____

1
2
3
4
5
6
7

In the Matter of Idaho Power Company's
Application for Deferred Accounting of Solar
Photovoltaic Pilot Program Revenues and
Expenditures

APPLICATION

I. INTRODUCTION

Pursuant to ORS 757.259, ORS 757.365, OAR 860-027-0300, OAR 860-084-0380 and -0390, Idaho Power Company ("Idaho Power" or "Company") hereby requests an accounting order authorizing Idaho Power to defer revenues collected through the Company's Tariff Schedule 93 – Solar Photovoltaic Pilot Program Rider ("Solar PV Program Rider") and expenditures associated with the implementation and administration of the Solar Photovoltaic Pilot Program, which is set forth in Schedule 88 ("Pilot Program"). Idaho Power seeks authorization for this deferral effective as of the date of this Application. In support of this Application, Idaho Power states:

1. Idaho Power is a public utility in the state of Oregon and its rates, services, and accounting practices are subject to the regulation of the Public Utility Commission of Oregon ("Commission").
2. This Application is filed pursuant to ORS 757.259, which allows the Commission, upon application, to authorize the deferral of certain items for later inclusion in rates.
3. Communications regarding this Application should be addressed to:

Lisa F. Rackner
McDowell Rackner Gibson PC
419 SW 11th Avenue, Suite 400
Portland, OR 97205
dockets@mrq-law.com

Regulatory Dockets
Idaho Power Company
P.O. Box 70
Boise, ID 83707
dockets@idahopower.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

II. OAR 860-027-0300(3) REQUIREMENTS

A. Description

ORS 757.365 (2009), as amended by House Bill 3690 (2010), mandated the development of pilot programs for each electric company to demonstrate the use and effectiveness of volumetric incentive rates and payments for electricity delivered by solar photovoltaic energy systems. The legislation authorized the Commission to establish incentive rates for the pilot programs to enable the development of the most efficient solar photovoltaic systems. As such, in Docket No. UM 1452, and approved with Order No. 10-198, the Commission established the Pilot Program to demonstrate the use and effectiveness of volumetric incentive rates (“VIR”) payments for electricity or for the non-energy attributes of electricity, or both, delivered from a solar photovoltaic system permanently installed by retail electric customers. The Commission allocated 0.4 megawatts of the Pilot Program capacity to Idaho Power and specified it was to be allocated only to residential qualifying systems.¹

The Commission approved Idaho Power’s Solar PV Program Rider effective July 1, 2010.² The Solar PV Program Rider is a balancing account mechanism that charges customers a percentage of the sum of the monthly charges for the base rate components of their electric bill. Base rate components include the service charge, energy charges, demand charges, and the basic charge. Revenues received from the Solar PV Program Rider fund the implementation and administration of the Pilot Program and are recorded in a regulatory liability account. As funds are used for administration of the program and VIR payments, the balancing account is debited for the amount of the expenditure disbursement.

¹ Idaho Power’s allotment is fully subscribed, as detailed in its bi-annual reports filed in RE 88 per OAR 860-084-0430.

² In accordance with the decision of the Commission in the Public Meeting of June 28, 2010, and per the letter dated June 28, 2010, from the Acting Commission Administrator.

1 With this deferral application, Idaho Power seeks authorization from the Commission
2 to defer, for future true-up, Solar PV Program Rider revenues and Pilot Program
3 expenditures. In addition, the Company requests that the Commission determine that
4 amortization of this deferral does not require an earnings review because it is subject to an
5 automatic adjustment clause under ORS 757.210(1). This treatment is consistent with the
6 cost recovery provisions in ORS 757.365(10) and OAR 860-084-0380, and the cost recovery
7 mechanisms approved for Portland General Electric Company³ and Pacific Power⁴ for the
8 implementation of their Pilot Programs.

9 **B. Reasons for Deferral**

10 ORS 757.365(10) and OAR 860-084-0380 provide that all prudently incurred costs
11 associated with the Pilot Program are recoverable in rates. In Order No. 10-198, the
12 Commission authorized Idaho Power “to recover 100 percent of its costs through a rider
13 mechanism.”⁵ This deferral will capture the difference between the revenues received
14 through the Solar PV Program Rider (*i.e.*, the rider mechanism authorized in Order No. 10-
15 198⁶) and the actual costs of the Pilot Program, thereby ensuring that Idaho Power recovers
16 100 percent of its costs—no more and no less.

17 _____
18 ³ *In the Matter of Portland General Electric Company, Application for Reauthorization to Defer*
19 *Expenses Associated with a Photovoltaic Volumetric Incentive Rate Pilot Program*, Docket No. UM
20 1482(8), Order No. 18-259, App. A at 3 (July 3, 2018) (“Earnings review - Pursuant to ORS 757.259(5),
amortization of this deferral does not require an earnings review as it is subject to an automatic
adjustment clause under ORS 757.210(1).”).

21 ⁴ *In the Matter of PacifiCorp, dba Pacific Power, Request for Reauthorization of to Defer Costs*
22 *Associated with the Oregon Solar Incentive Program*, Docket No. UM 1483, Order No. 17-305, App.
23 A at 3 (August 10, 2017) (“Earnings review - Pursuant to ORS 757.259(5), amortization of this deferral
does not require an earnings review as it is subject to an automatic adjustment clause under ORS
757.210(1).”).

24 ⁵ Order No. 10-198 at 21.

25 ⁶ In compliance with Order No. 10-198, on June 21, 2010, Idaho Power filed Advice Nos. 10-
26 11 and 10-12 requesting approval of Schedule 88 – Solar Photovoltaic Pilot Program implementing
the Pilot Program, and Schedule 93 - Solar Photovoltaic Pilot Program Rider, the cost recovery

1 and administration of the Pilot Program, beginning the date of this Application, and that those
2 deferred amounts are exempt from an earnings test.

3 DATED: October 18, 2018

4 IDAHO POWER COMPANY

5 

6 LISA F. RACKNER

7 Attorney for Idaho Power Company

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

Attachment A

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM _____

In the Matter of Idaho Power Company's
Application for Deferred Accounting of Solar
Photovoltaic Pilot Program Revenues and
Expenditures

**NOTICE OF APPLICATION FOR
DEFERRED ACCOUNTING OF
SOLAR PHOTOVOLTAIC PILOT
PROGRAM REVENUES AND
EXPENDITURES**

On October 18, 2018, Idaho Power Company ("Idaho Power") filed an application with the Public Utility Commission of Oregon ("Commission") for an order authorizing deferral of revenues collected through the Company's Tariff Schedule 93 – Solar Photovoltaic Pilot Program Rider and expenditures associated with the implementation and administration of the Solar Photovoltaic Pilot Program.

Approval of Idaho Power's Application will not authorize a change in Idaho Power's rates, but will permit the Commission to consider allowing such deferred amounts in rates in a subsequent proceeding.

Idaho Power's Application will be posted on the Commission website for persons who wish to obtain a copy or they may contact the following:

Lisa F. Rackner
McDowell Rackner Gibson PC
419 SW 11th Avenue, Suite 400
Portland, OR 97205
dockets@mrq-law.com

Any person who wishes to submit written comments to the Commission on Idaho Power's Application must do so by no later than November 16, 2018.

DATED: October 18, 2018.



Lisa F. Rackner
Attorney for Idaho Power Company

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I served a true and correct copy of Idaho Power Company's
3 Application for Deferred Accounting of Solar Photovoltaic Pilot Program Revenues and
4 Expenditures on the parties in Docket UE 233, Idaho Power Company's last general rate
5 case, on the date indicated below by email addressed to said person(s) at his or her last-
6 known address(es) indicated below.

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

Citizens' Utility Board of Oregon
OPUC Dockets
dockets@oregoncub.org

Robert Jenks
Citizens' Utility Board of Oregon
bob@oregoncub.org

Judy Johnson
Public Utility Commission of Oregon
judy.johnson@state.or.us

Stephanie Andrus
Assistant Attorney General
stephanie.andrus@state.or.us

Don Reading
dreading@mindspring.com

Donald Schoenbeck
Regulatory & Cogeneration Services
dws@r-c-s-inc.com

Erik Colville
Public Utility Commission of Oregon
Erik.colville@state.or.us

Gregory M. Adams
Richardson Adams PLLC
greg@richardsonadams.com

Peter J. Richardson
Richardson Adams PLLC
peter@richardsonadams.com

Joshua D. Johnson
Attorney at Law
jdj@racinelaw.net

John W. Stephens
Esler Stephens & Buckley
Stephens@eslerstephens.com
ortez@eslerstephens.com

Anthony J. Yankel
Utility Net.Inc.
tony@yankel.net

Randy Dahlgren
Portland General Electric
pge.opuc.filings@pgn.com

Douglas C. Tingey
Portland General Electric
doug.tingey@pgn.com

Irion Sanger
Sanger Law PC
irion@sanger-law.com

Sarah Link
Pacific Power
sarah.link@pacificcorp.com

Etta Lockey
Pacific Power
Etta.lockey@pacificorp.com

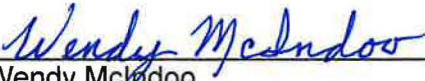
Oregon Dockets
PacifiCorp
oregondockets@pacificorp.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

Wendy Gerlitz
NW Energy Coalition
wendy@nwenergy.org

Renewable Northwest
dockets@renewablenw.org

DATED: October 18, 2018



Wendy McIndoo
Office Manager