

Diane Holt

From: jay.m.basen@gmail.com
Sent: Wednesday, August 9, 2017 9:10 AM
To: Beverly Barker; Diane Holt; Matthew Evans
Subject: Case Comment Form: Jay Basen

Name: Jay Basen
Case Number: IPC-E-17-13
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Telephone:
Address: 180 Cranbrook Drive
Hailey ID, 83333

Name of Utility Company: Idaho Power

Comment: One year ago Idaho Power held a public meeting where they presented new fees targeted at owners of solar panel systems. The overwhelming response at that meeting was opposition to their plan. In spite of that public response Idaho Power is trying to move forward with new fees through this submission to the Idaho Public Utilities Commission. These fees, and new requirements for hardware, in many cases, would make these system cost prohibitive and stifle innovation that solar systems have the potential to bring to electricity production in the state of Idaho.

First and foremost, Idaho Power's plan is to specifically burden solar system owners with higher fees. However, to me a solar panel system is no different from any other energy savings initiative that a homeowner, or business, can initiate. Incandescent light bulbs can be replaced with LED bulbs. Older, less efficient appliances can be replaced with energy star rated appliances. Electric stoves, furnaces, and even hot water heaters can be replaced with ones that use inexpensive, natural gas. All of these reduce the consumption of electricity and lower electric bills.

What Idaho power is doing is to take the lower consumption per user, because people have become much more energy conscious in recent years, and are placing that entire burden on net metering customers (Idaho Power's term for people with solar generating systems). Idaho Power isn't recognizing that net metering customers are really the same as their entire customer base; they have simply invested more to further reduce their bills. To signal out net metering customers to cover the burden of lower consumption by all customers is a totally invalid approach that will stifle innovation that can keep Idaho Power from having to invest in new generating infrastructure and potentially even reduce the costs of their current infrastructure.

Secondly, Idaho Power is now viewing residential and business operated solar energy systems as competition. Idaho Power believes in solar energy. They have recently put online their own solar generating system and are charging a special subscription fee for people to gain access to the power generated by this environmentally friendly system. Providing power with a special fee to make people feel they are helping the environment has the potential to make a lot of money for Idaho Power. But, residential and business solar generating systems have now become a competitor to their own solar generating system and the "feel good" fee they have attached to the power generated from it. The new fees that Idaho power is proposing can also be seen as a way to attack that competition to maintain a monopoly on power generation.

Finally, Idaho power has proposed new requirements for the hardware used in residential and business solar generating systems. They want to require these installations to use state of the art equipment that, of course, costs more than equipment that is adequate and safe. This is simply another technique for raising the costs of solar systems to make these systems cost prohibitive.

Potentially, in the future, a great number customers could have solar systems installed. In that scenario Idaho Power might be able to significantly reduce their fixed costs by closing their older, dirty, coal fired, power generating stations. This possible future scenario has no chance of becoming reality if Idaho Power pursues its current rate plans which would completely stifle residential and business investment in solar energy by making it cost prohibitive.

Please deny this request.

Thanks for your time, consideration, and support.

Unique Identifier: 68.105.213.59

Diane Holt

From: davahmet@gmail.com
Sent: Wednesday, August 9, 2017 10:30 AM
To: Beverly Barker; Diane Holt; Matthew Evans
Subject: Case Comment Form: David Manning

Name: David Manning
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Name of Utility Company: Idaho Power

Comment: Idaho Power bases its argument on the solar energy penetration of approximately 1,400 residential and small generation service customers in its service area of approximately 500,000 customers (~0.3% penetration), asserting that the discontinuation of Schedule 84 is necessary because of unfair cost-shifting caused by the 0.03% penetration. Idaho Power forecasts that participating R&SGSC customers would increase to 6,000 to 7,000 by 2021, increasing the cost-shift burden to no-participating customers. The basic flaw in this argument is the assumption that Idaho Power's customer base remains static at 500,000, disregarding the high population growth rate experienced recently and expected to continue. The basis of their argument is a faulty penetration estimate.

Particularly concerning in Idaho Power's request is the change to net-metering capacity limits for Small Generation Service Customers from 100kW in Schedule 84 to 25kW in Schedule 8, effectively eliminating the use of solar photo-voltaic systems by most commercial businesses. This is extremely detrimental to our community small business owners who would explore ways to reduce the cost of operation.

As demand load increases due to population increases, Idaho Power's capability to provide service is further complicated by the projected loss of coal-fired generation and potential reduction of hydro-electric generation caused by public pressure for dam breaching. Increased capacity through distributed energy resources during peak load times would seem to be a logical mitigation of these expected constraints.

Although Idaho Power has not specified any rate changes in their request, the reduction of net-metering in Schedule 8 is an obvious constraint to cost reduction options for our small business community. I can only conclude by the language in the request that it is less about the fairness of cost-shifting and more about impeding the growth of solar photo-voltaic distributed generation.

Unique Identifier: 75.174.130.63