Diane Holt

From: js_weber@hotmail.com
Sent: Sunday, August 13, 2017 1:42 PM
To: Beverly Barker; Diane Holt; Matthew Evans
Subject: Case Comment Form: John Weber

Name: John Weber
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Name of Utility Company: Green Mountain Energy
Comment: I respectfully request a public hearing for the PUC commissioners to hear comments from the public. My comments are as follows.
Page 4 Section 4
Net metering customers are only credited in kwhs in the billing cycle when they are put back into the grid. Idaho Power also bills their neighbors for the kwhs received from the net-metering customers during the same billing period. If and when the net-metering customers use their kwh credit at a future date, they receive no interest on the kwh loan they have provided to Idaho Power who has already sold and likely collected the money for the loan they received from the net-metering customer. Idaho Power should be required to pay a fair rate of interest on any kwh credit a net metering customer carries over.
Page 5 Section 7
If existing rate structure creates inequity between net metering customers and standard service customers then it also creates an inequity between customers that install new efficient appliances (like an air conditioner or heat pump) and standard service customers (SSCs). Idaho Power's so called "wealth transfer" from the poor to the rich happens whenever a "higher income" customer upgrades heating/cooling, lighting, or other appliances with a more efficient model. The only time this so called "wealth transfer" doesn't happen is when a "higher income" customer buys an electric vehicle that will increase his/her household electricity usage. How does Idaho Power plan to eliminate these other so called "wealth transfers" to be "fair"?
I personally know many Idaho Power net metering customers and I do not consider any to be "higher income customers". All of the net metering customers I know have incomes less than the average salary of Idaho Power employees.
Is Idaho Power trying to start a class war by this filing? To be "fair", should customers pay based on their energy usage or their ability to pay? Will customers have to provide tax returns and bank statements before they are given service?
Yes, there is a "wealth transfer" going on here. It is from the all the customers to Idaho Power's Board of Directors, Employees, and shareholders.
Page 6 Section 9
By what method is Idaho Power using to project future net metering customers? Based on past projections of all sorts of different items, they have likely inflated these numbers to benefit their case.
Page 8 Section 13
It is true that the two-way flow of energy is unique and fundamentally different than a non-net metering customer. In the case of small hydro the power could be generated 24 hours a day and the value of that electricity would change during that time period. Wind power could be generated at different times throughout the day. Solar power will only be generated during the day time and many cases during peak power time. The value of each of these net metering outputs in different based on what time of day and what time of the year they are generated.
Page 8 Section 14

The load shape of residential net metering (RNM) compared with residential standard service (RSS) shows the benefit of generation during peak time. It also shows an increase of use in the evening and early morning. This is likely due to the charging of plug-in vehicle. Many RNM customers own or lease plug-in vehicles. Idaho Power can incentivize plug-in vehicle owners to plug in whenever it will benefit the electrical grid and all customers.

Page 9 Section 15

If new customer classes are installed for customers with on-site generation to provide data, all types of generation must be assigned a different class in order for the data to be meaningful and "fair". That would necessitate a class for hydro, biomass, fuel cells, geothermal, wind, and solar. The value of all of these types of generation varies greatly.

To be "fair" time of use metering or better yet real time metering can be used to charge all customers based on the cost of generation at the time of use.

Does this also mean in "fairness" there should be rural and urban rate designs? The grid operation and maintenance costs are much less in urban areas than rural areas. Is there "wealth transfer" going on currently between the urban customer to the rural customers? How should this be addressed, in fairness?

Page 12 Section 21

We are currently, and even in Idaho Power's future growth estimate nowhere near a "high penetration" of net metering customers or their nameplate capacity.

Proposed New Schedule 6

Any credits that are given back to Idaho Power should be used to reduce the rates of all customers. They should not be retained by the company to further engorge their profits. An example would be when a net-metering customer moves to another state.

Point #6- It is not currently technically possible for a small generation net metering customer to curtail production. This paragraph should be removed.

Proposed New Schedule 8

Point #6- It is not currently technically possible for a small generation net metering customer to curtail production. This paragraph should be removed.

David Angell Testimony

Page 8- It is true that most on-grid inverters will not function without the grid present. This is by design to protect utility workers from possible electrocution. The inverters will not feed power into the grid when the grid is down.

Page 9- It is misleading to state that most inverters are not sized big enough to run air conditioners, pumps, and household motors without being connected to the grid. Most modern inverters have the reactive energy to start these devices. I have run a whole house heat pump year round with a 4 kW inverter without being connected to Idaho Power's grid.

Page 12- The graph shows the contribution the net metering customer makes to power his/her neighbor during the middle of the day.

Page 13- The graph shows the contribution the net metering customer makes to power his/her neighbor during the middle of the day.

The smart meter testimony sounds like Idaho Power wants net metering customers' equipment to solve the low voltage problem they have had with the grid for years at the expensive of the net metering customers. Idaho Power should pay the additional cost for a "smart inverter" to fix their low voltage problem if that is the solution they seek.

Connie Aschenbrenner Testimony

Page 16- If there are 1,468 current and pending net metering customers, how come only 830 invitations for the workshop were sent out?

Page 30- Figure 4 is a good example of the benefit of solar net metering customers. They act as demand side management during most of the peak hours in the afternoon reducing the amount of time expensive gas peaker plants are utilized. In most cases Idaho Power pays customers for demand side management.

Page 30- The vacation home example doesn't hold water. Both the vacation home and the net metering home are hooked up to the grid. The wires and distribution system must be maintained regardless of usage. The power poles and wires don't degrade at a different rate depending on the electrons used.

Page 31- In the case of energy efficiency as compared with net metering solar customers. The solar net metering customer production falls mostly during peak power time saving Idaho Power more money than energy efficiency that falls throughout the day.

Page 35- Idaho Power already profits enough from net metering customers. They have received an interest free kWh loan from the net metering customer in which they sell to another customer, billing and making a profit almost instantly. This loan may or may not have to be repaid in the future. If repaid there will be no interest. For solar net metering customers, they give a loan of peak power in the summer season (expensive generation for them) and if they pay that loan back it is normally paid back with non-peak power in the winter season (inexpensive generation for them). It is hard to understand why they want to collect even more profit from these renewable generators.
Page 36- Regarding the customer comment about his/her $5.27. How much did the customer pay for the system? How much did this system save Idaho Power from building new generation?
Slide show- Shows 526,000 customers and only 1,468 current and pending net metering customers. The net metering customers are a small fraction of the total customers. Future growth is not guaranteed. Why are customers wanting to net meter? It is not a purely economic decision. If it were, nobody would do it. It is mostly based on wanting to receive 100% renewable power, which Idaho Power doesn't offer. Net metering would be a non-issue if electric utilities were deregulated in Idaho. Then customers could elect for 100% renewable generation through the utility company of their choice. A good example of how it works in another conservative state would be Texas that has literally hundreds of plans a customer can choose from. It appears to be time to start discussing deregulation in Idaho.
Timothy Tatum Testimony
Page 15- A case cannot be made without real customer data (including income and wealth of all customers) that the lower income customers are transferring wealth to the higher income customer. It may actually true that the lower income customers are installing solar panels and because of that they may be transferring wealth to the higher income customers that do not choose to install solar panels. The investments net metering customers make could be saving all of customers' money. They should be compensated for this.
If Idaho Power is concerned that lower income can't have solar on their homes they can start a program for the lower income customers to received a reduced rate loan that will be paid off as part of their electric bill.
Page 25- States that the payback period for a net metering solar system is 15 years. This proves the point customers are not electing to do this for economic reasons but likely for reasons relating to reducing their personal contribution to global green house gases because Idaho Power refuses to give them the 100% renewable power which they demand.
Exhibit 3
Page 2- Does shows solar's growth. What was missing from Timothy Tatum's Testimony was that the majority of the growth is from utility solar projects. It is likely customer's would not install solar on their roofs if Idaho Power delivered solar power to their houses.
Page 4- Confirms it is most expensive for net metering customers to have solar installed themselves but they have few other options living in Idaho Power's service area.
Page 5- Shows Idaho is not even in the top 10 states for installed solar even though Idaho has excellent potential for generation.
Page 7- Future growth is estimated to come mostly from utility scale solar projects not residential.
Exhibit 5
Obviously this article was written for the purpose of electrical utilities being able to battle the net metering customers. It even includes an estimate for Idaho Power. It lists no references of where this number came from or how it was figured. This is not a peer review article and should not be allowed as part of the testimony.
The article does not address the Idaho Power current model for crediting surplus generation by the kwh but by the retail rate per kwh. This is not comparing apples to apples.
The article does point out, as I have submitted in comments for the last 10 years, "This time-of-use differentiation would provide rooftop solar owners with a fairer compensation for their contribution to the system needs. Unfortunately, such distinctions are almost never made in the prevailing net metering pricing schemes."
Exhibit 6- A big question that did not seem to be addressed is what will happen to the commercial net metering customers, if anything. They are currently using Schedule 84 up to 100 kw of nameplate generation? Will Schedule 84 still be used by them?

Diane Holt

From: jcalom1799a@gmail.com
Sent: Friday, August 11, 2017 3:25 PM
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Address: 211 N Flume St
Boise Idaho, 83712-6318

Name of Utility Company: Idaho Power
Comment: I am writing about the recent proposal to change the electric rate structure for those customers installing their own solar panels. In April of this year, I installed 3.5KW of solar panels on my rooftop. At that time, I understood and agreed to an arrangement that gave me credit for any energy I produced; when I have excess energy over my usage, I get a credit that can be later used to offset future usage.

While I am generating more than I use and it may be possible that I will never get to use the credits for that excess energy generated, I agreed with that arrangement and this is the arrangement that I used to decide on the overall benefit to invest in my panels.

Now, just several months after I installed and invested in my panels, Idaho Power states they may want to change this agreement with me in the future. While they have not described the specifics of any future change, I do not feel that this is reasonable and fair way to deal with someone whom you have made a contract with. They now have decided that they do not think they made a good deal and want to back out of their side of the bargain.

Needless to say, I oppose any changes to the rate structure and agreement that Idaho Power has made with existing solar panel investors. While I can understand that there is a reasonable argument that can be made that everyone should pay for fixed costs of providing electricity, I also believe Idaho Power should also consider the cost benefits they receive in not having to invest in new production facilities by having these solar panels providing additional peak generating capacity. These are significant costs that can be avoided and if those are factored in, then maybe the overall cost versus benefits analysis from these distributed sources would actually entail Idaho Power paying solar panel producers for this valuable peak power. Of note is the fact that Idaho Power already pays me $5 a month in the Summer to allow them to turn off my AC during peak demands.

Lastly, there are other benefits accrued by our society and Idaho Power that should be considered when deciding on rate structures for solar panel customers. This would include helping to further the development of a new and very promising clean energy technology and the benefits of reducing our overall Carbon/CO2 output with a non-polluting energy source.

Thank you for considering my input.

John Calomeni

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