

Diane Holt

From: jgalgano@hotmail.com
Sent: Thursday, August 31, 2017 2:49 PM
To: Beverly Barker; Diane Holt; Matthew Evans
Subject: Case Comment Form: Johnny Galgano

Name: Johnny Galgano
Case Number: IPC-E-17-13
Email: jgalgano@hotmail.com
Telephone: 2087202996
Address: 180 Cloverly Lane
Hailey IDAHO, 83333

Name of Utility Company: Idaho Power Company
Comment: TO:COMMISSIONER KJELLANDER COMMISSIONER RAPER COMMISSIONER ANDERSON COMMISSION SECRETARY COMMISSION STAFF

FROM:JOHNNY GALGANO 180 CLOVERLY LANE
HAILEY, IDAHO 83333
DATE: AUGUST 31, 2017

SUBJECT:IDAHO POWER COMPANY'S APPLICATION FOR AUTHORITY TO ESTABLISH NEW S SCHEDULES FOR RESIDENTIAL AND SMALL GENERAL SERVICE CUSTOIVIERS WITH ON- SITE GENERATION, CASE NO.IPC.E-17-13,

I have been made aware of Idaho Power Company request for new rate schedules for solar power providers within the state of Idaho. Let me be clear there are two ways to do things, the right way and again. This rush to change the rate schedules for new solar power providers to Idaho Power Company is short sighted in its research and development. This new rate schedule will dissuades potential providers of solar power to Idaho Power Company which is harmful not only to those providers but the Idaho population in general. By using renewable energy sources and moving away from harmful energy sources such as coal and oil we help ourselves, our neighbors, our country and our world. We need to start thinking and acting globally if we wish to leave a viable world for our future generations.

I constructed a new home in 2016 and built a 9.1Kw solar power system and I currently use net metering with the Idaho Power Company. Should these rate changes come to pass it will only pave the way for other rate changes to existing solar power providers to Idaho Power Company. At that time I will remove myself from the grid, install a battery system and keep all of the generated power for my own use and not share the excess with Idaho Power Company who then sells it off. This is a lose lose situation for both my family, my neighbors who can use my excess energy and Idaho Power Company as they will not be servicing my home in any way shape or form.

Please carefully consider Idaho Power Company's application and reject their request for rate schedule changes.
Respectfully,

Johnny Galgano

Unique Identifier: 68.105.215.101

Diane Holt

From: steve@berkeleyinc.com
Sent: Friday, August 18, 2017 9:40 AM
To: Beverly Barker; Diane Holt; Matthew Evans
Subject: Case Comment Form: Stephen White, CFA

Name: Stephen White, CFA
Case Number: IPCE1713
Email: steve@berkeleyinc.com
Telephone: 2088536980
Address: 3778 Plantation River Dr, Suite 102
Boise ID, 83703

Name of Utility Company: Idaho Power

Comment: As a financial advisor who is often contacted for advice on whether to install solar panels, I am deeply frustrated at Idaho Power's recent filing. It sheds no light on the value of solar, all it does is sow confusion and uncertainty. That level of uncertainty is made worse and more permanent by proposing a policy that customers investing in on-site generation products offered by Idaho Power's few competitors will be put in a tiny separate class which will thereafter be vulnerable to discriminatory rates and fees.

Let's go back to a fundamental principle of investing – the greater the risk, the higher the potential return needs to be to motivate investment. By proposing a policy that increases the risk of solar investments, Idaho Power is unnecessarily discouraging investment in solar. To be clear, there is always some level of uncertainty in investment decisions and specifically with electricity rates, but Idaho Power's proposal to put net metering customers into their own tiny class creates a disproportionate level of risk and uncertainty for prospective solar customers and the businesses that serve them.

For example, a non-profit board asked me to present last night my recommendations regarding the installation of a solar array to offset a portion of their electric bill. At least half the discussion and the majority of the concerns centered on the filing before the PUC, including a wide range of speculations on how the economics of the investment might change in the future. The Board's readiness to invest in a solar array was markedly affected by the discriminatory tone and cloud of uncertainty created by this filing.

In this filing, prospective solar customers are being told that installing an array of ANY size will thereafter make them vulnerable to discriminatory rate structures, that Idaho Power would like to change the economics of the investment the customer is considering, but that Idaho Power doesn't have the evidence to propose fair policies.

In terms of credentials, I have an undergraduate degree in finance, an MBA from Harvard, and hold the Chartered Financial Analyst (CFA) designation - I believe I qualify as an economically logical person, and this filing lacks logic. Idaho Power's real concerns are revealed by its focus on "On-Site Generation," which is not the issue. The Company also uses the filing to reiterate its long-term concern that it recoups fixed costs via volumetric pricing, which, as I understand it, was a strategic move by the PUC to encourage energy conservation. In any event, it is a concern not specific to Idaho Power, and certainly not specific to net metering.

Net metering customers should remain in their current rate classes. They should be free to buy kWh off the grid and pay the same monthly and volumetric rates as other standard customers. Concerns over cost shifting should prioritize the big dollars, and – only if it's demonstrated as truly material - any concerns over the value of kWh put back on the grid should focus on determining value, including the benefits of solar and the timing at which it is generated. Discriminatory

policies like this one before the PUC create disproportionate and unnecessary risk for prospective investments in solar, and it's a job killer for this young and vital industry.

Unique Identifier: 67.42.72.103

Diane Holt

From: hansonrex@gmail.com
Sent: Thursday, August 17, 2017 3:18 PM
To: Beverly Barker; Diane Holt; Matthew Evans
Subject: Case Comment Form: Rex Hanson

Name: Rex Hanson
Case Number: IPC-E-17-13
Email: hansonrex@gmail.com
Telephone: 2086140372
Address:
Caldwell ID, 83605

Name of Utility Company: Idaho Power

Comment: I am writing to request that the Idaho PUC deny Idaho Power's request to establish new rate classes targeting net metering customers.

As a net metering customer since April 2016, I have been very pleased with the net meter installation and service provided to date by Idaho Power. I also have sympathy for IP management as they deal with the budget and planning impacts from this disruptive technology. However, I feel that this most recent proposal for new rate classes is premature and doesn't fully address several key issues:

- 1) Why target only net meter customers without comparing the costs & revenues from the full spectrum of Idaho users eg rural vs city, low vs high volume users, etc?
- 2) Can we see more projection scenarios for load balancing as additional net metering customers join the grid? I would expect peak load requirements (and costs to IP) would be reduced over time with additional solar power users. Graphs shown in the Idaho Power documents seem to support this, but are incomplete as they compare "average" users, not the total impact on the system (Aschenbrenner - Figure 3).
- 3) Idaho Power currently offers several incentives to customers to save energy and reduce use of power & environmental impact. Assuming we want to continue to support this admirable goal, does the PUC wish to slow the growth of solar power benefits and the related job creation, by introducing uncertainty to the economic benefits at this time?
- 4) Over the 5 year planning period, has the full impact of improving solar technology been included? If panel & battery technology and costs continue to improve, use of the current grid will continue to change and likely be reduced. I think that the PUC and public need to be better informed about how the grid costs will be paid in the future. Increasing grid costs to specific consumers will encourage those folks to avoid grid use and further increase the cost recovery problem - a potential downward spiral.

I appreciate the opportunity to provide my opinion here.

Respectfully,

Rex Hanson
Caldwell, Idaho

Unique Identifier: 67.61.117.145

Naomi Carr

From: Diane Holt
Sent: Thursday, August 31, 2017 4:27 PM
To: Jo Nelson; Reyna Quintero
Cc: Naomi Carr
Subject: FW: Case number : PC-E-17-13, Comments on Idaho Power's request to change the net metering billing class
Attachments: Rebuttal4IdahoPowersRateChangeNetMetering.docx

-----Original Message-----

From: gSoren [mailto:gordons@fastmail.com]
Sent: Thursday, August 31, 2017 4:25 PM
To: Diane Holt <Diane.Holt@puc.idaho.gov>
Subject: Case number : PC-E-17-13, Comments on Idaho Power's request to change the net metering billing class

Diane,

Attach are my comments regarding Case number PC-E-17-1, Idaho Power's request for changes for Net metering customers.

Regards,

Gordon Sorensen

--

gSoren
gordons@fastmail.com

In regards to Idaho Power's request to create a new rate structure for net metering customers, Idaho Power should first change the billing structure so that all customers pay directly for the Idaho Power services they use. Then accurately and fairly determine the what and how much to cover each of these services and then appropriately charge all customers, including net metering customers. Penalizing a select set of customers for using less electricity is discriminatory and unfair.

From Tatum's deposition; "customers with on-site generation may pay less than their fair share for the grid-related services they require"

Idaho Power's proposal to create a new rate structure and to later charge net metering customers more for not paying their "fair share" does not truly address the problem of not paying their "fair share". It mostly just moves it around, actually making it worse as it further obfuscates the billing charges. The way to correct this issue is to improve the transparency of the billing charges. By identifying what services and products the customer has requested and used, the billing should fairly and accurately reflect what customers would pay for their fair share. Burying the different services and products in the "volumetric" charges hides the true costs of the services and products being purchase and consumed.

The main argument being presented for moving net metering customers into a different and eventually higher rate structure appears to be the "fair share" issue. Idaho power asserts that net metering customers use less power through generation of their own power. They therefore are avoiding paying "their fair share" of the fixed costs associated with connecting to the grid. On the shiny surface of that arguement, that is true, but dig deeper. What about the customer that kicks his electric hot water heater to the curb and installs a gas or a solar hot water system. They are using less power. By the current logic, that customer is also guilty of not paying their fair share. Why are they not charged more for their remaining kWh consumption?

The net metering customer, in the course of generating their own power, potentially is not paying some of that "fair share", like the cost of banking the excess generated power for later consumption. But before singling out the net metering customer, I suggest that Idaho Power figure out what is truly this "fair share" of the fixed costs along with the individual components therein. This cost for accessing the grid should be fairly and accurately determined for all the different classes of customers and that cost should be listed as a base charge(s) on the customer's monthly billing. The current \$5 fee is most likely purely symbolic and woefully inadequate to recovering the fixed costs of the system. Indeed as I read Connie Aschenbrenner's testimony, she states:

"The residential customers taking service under schedule 1, Residential Service, have a two-part rate design with most of the customer related fixed costs and all demand related fixed costs being recovered through volumetric charges. The revenue requirement for the residential customer class is comprised of approximately 70% fixed costs and 30 percent variable energy costs; however only five percent of the total revenue is collected through the fixed service charge and the remaining 95% is collected through the volumetric energy charge."

Holy smokes, our power bills are mostly to cover the costs of just having the grid! So my March 2016 \$100.38 bill for 1050 kWh of power covered \$75 of fixed cost and \$25 for the 1050 kWh I used or 2.4 cents per kWh. Can you even buy power that cheap? That is nuts. How can Idaho power be profitable? And just a small reduction in usage is going to bankrupt them. If those are truly fixed costs then all the customers should be paying at least a \$75 fixed service charge. Why on earth did Idaho Power ever have energy reduction programs like wrapping hot water heaters with insulating blankets? That program alone should have nearly broke the bank.

JACKSON C. GOSS

1825 W Lemhi St, Boise ID 83705

PHONE 208-912-6241, EMAIL JGOSS159@GMAIL.COM

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JPC-E-17-13

2017 AUG 30 PM 2:43

27 August 2017

Subject: Alternative Energy Rate Increases

To:

Idaho Public Utilities Commission

472 W Washington St

Boise ID 83702

I would like to express my opposition to Idaho Power's proposed rate increase for alternative energy customers. They claim that normal customers are picking up the costs of alternative energy customers.

Background on me: I am a middle class American Millennial. I just purchased my first house in the Bench neighborhood. I was so excited to contribute to clean and safe energy that I had a solar power system installed on my roof within 3 months of buying my house. I couldn't afford to offset all of the electricity that my family consumes, only a small percentage of it (20-40 % depending on weather). My financial decision to go with solar power was based on current rates, and I am by no means saving a ton of money, it will take a full 30 years to pay back the cost of solar. I also did this for the environment--to switch from traditional fuel sources, such as coal or natural gas to something more sustainable.

I was disheartened to hear that Idaho Power was targeting solar and wind producers specifically to raise rates. Since I do not offset my entire power bill, I still am impacted by normal rate increases to normal customers, AND rate increases to solar customers. I feel that the costs for power should be proportionally spread based on how much power a customer uses.

Further, customers, such as myself who produce power should receive regular retail rates because the power generated via solar or other renewable sources improves the overall electrical grid and lowers the need to buy power at peak times of demand.

In summary, I strongly oppose Idaho Power's rate increase targeted at solar and wind customers.

Sincerely,



Jackson Goss

Diane Holt

From: Diane Holt
Sent: Wednesday, August 30, 2017 3:10 PM
To: Diane Holt
Subject: IPC-E-17-13

From: davidhharris@gmail.com [<mailto:davidhharris@gmail.com>] **On Behalf Of** David Harris
Sent: Wednesday, August 30, 2017 2:51 PM
To: IPC-E-17-13@harris.boise.id.us
Subject: IPC-E-17-13

I have to items to address.

First, as a senior member of IEEE, and an Electrical Engineer with a PE license in Idaho, I applaud the recommendation to require the installation and operation of smart inverter(s) for all new customer-owned generator interconnection. However, I believe the delay of 60 days from IEEE adoption of a standard to its enforcement would unduly burden potential new "R&SGS" customers; starting with those who are already in the process of either designing/installing their own PV Solar, or those using the services of companies providing end-to-end solutions, or anywhere in between, I think that delay should be extended from 60 days to something more on the order of 180 days.

Secondly, I would suggest that some errant logic is in play in the application. That the "Company" needs to establish new rate schedules in order to prove its inherent assumption that its "existing rate design inaccurately reflects the costs and benefits of serving customers that have on-site generation" makes an assumption (the adverb inaccurately) that has not been proven true, and bases its request thereon. A rate structure will only help separate out a sub-segment of customers, it will not help determine what power they use or generate; that information, I would suggest, is already buried in the data the "Company" keeps for every account. Separating customers into a new rate structure is overreach when a simple spreadsheet sort or database query filter would do the same thing. In other words, I think they're doing things out of order.

Thanks for the opportunity to comment.

Diane Holt

From: Mymom39@yahoo.com
Sent: Tuesday, August 29, 2017 3:26 PM
To: Beverly Barker; Diane Holt; Matthew Evans
Subject: Case Comment Form: Sandra Schoenhut

Name: Sandra Schoenhut
Case Number: IPC-E-17-13
Email: Mymom39@yahoo.com
Telephone: 2088505345
Address: 4885 North Five Mile
Boise ID, 83713

Name of Utility Company: Idaho power

Comment: I am writing to object to Idaho Power's proposed increases in net metering. We have just installed solar power on our home. We will be paying for the system for the next 20 years. Had we known that we could be charged a higher rate simply by installing solar panels, we would not have done it. This requested change would create a hardship for us since we will be paying for the panels along with a higher power bill. This change will definitely cause others to decide NOT to install renewable energy while renewable energy should be encouraged. The number of users is small and even future projections put the number at a very small percentage of users. I am requesting that this proposal be rejected.

Unique Identifier: 66.87.126.102

Cost Increase Proposed by Idaho Power for Customers with Solar or Wind Turbines

Citizen Comment to the Idaho Public Utilities Commission

P O Box 83720 Boise, Idaho 83720-0074; FAX: (208) 334-3762

Case Number: IPC-E-17-13

2017 AUG 32 AM 9:07

My power company is Idaho Power

I want Idaho Public Utilities Commission to know:

I want to keep solar and wind power **affordable** in Idaho.

I may want to put solar power on my property in the future.

I like solar & wind power because they will bring **thousands of jobs** to Idaho.

I would like to see a ^{better} **state incentive program** for installation of solar and/or wind.

Idaho Power should continue to pay for power generated by customers; keep *Schedule 84* that provides net metering.

Idaho Power should embrace solar power because it reduces the need for power during the day when air conditioners are running the most.

Idaho should work with their customers to develop strategies to encourage distributed generation, as other power companies do.

Idaho Power should invest in more renewable energy and divest from fossil fuels.

Idaho Power should reimburse the cost of a home owner's solar system because they reduce the need for more infrastructure (power lines, power plants, etc.).

Additional Message to Idaho Public Utilities Commission:

Signed: Virginia Murphy Date: 8-29-17

Your Name: Virginia Murphy

Address: 2218 Douglas St

City: Pocatello State: ID Zip: 83201

Email: Murpvirg@isu.edu

I acknowledge that submitting a comment in an open case constituent a public record under Idaho Code 74-101 (13) and all information provided by me on the is form is available for public and media inspection. My comment may be reviewed by the utility.

Cost Increase Proposed by Idaho Power for Customers with Solar or Wind Turbines

Citizen Comment to the Idaho Public Utilities Commission

P O Box 83720 Boise, Idaho 83720-0074; FAX: (208) 334-3762

Case Number: IPC-E-17-13

2017 AUG 32 AM 9: 08

My power company is Idaho Power

I want Idaho Public Utilities Commission to know:

- I want to keep solar and wind power **affordable** in Idaho.
- I may want to put solar power on my property in the future. *Please do not contact at this time*
- I like solar & wind power because they will bring **thousands of jobs** to Idaho.
- I would like to see a ^{better} **state incentive program** for installation of solar and/or wind.
- Idaho Power should continue to pay for power generated by customers; keep *Schedule 84* that provides net metering.
- Idaho Power should embrace solar power because it reduces the need for power during the day when air conditioners are running the most.
- Idaho should work with their customers to develop strategies to encourage distributed generation, as other power companies do.
- Idaho Power should invest in more renewable energy and divest from fossil fuels.
- Idaho Power should reimburse the cost of a home owner's solar system because they reduce the need for more infrastructure (power lines, power plants, etc.).

2017 SEP - 1 AM 9: 01
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Additional Message to Idaho Public Utilities Commission:

Signed: Craig Sorenson Date: 8/21/2017

Your Name: Craig Sorenson

Address: 956 W. Wyeth

City: Pocatello State: ID Zip: 83204

Email: Craig.Sorenson@gmail.com

I acknowledge that submitting a comment in an open case constituent a public record under Idaho Code 74-101 (13) and all information provided by me on the is form is available for public and media inspection. My comment may be reviewed by the utility.

Cost Increase Proposed by Idaho Power for Customers with Solar or Wind Turbines

Citizen Comment to the Idaho Public Utilities Commission

P O Box 83720 Boise, Idaho 83720-0074; FAX: (208) 334-3762

Case Number: IPC-E-17-13

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2017 AUG 32 AM 9:08

IDAHO PUBLIC UTILITIES COMMISSION

IDAHO PUBLIC UTILITIES COMMISSION

2017 SEP -1 AM 9:57

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My power company is Idaho Power

I want Idaho Public Utilities Commission to know:

- I want to keep solar and wind power **affordable** in Idaho.
- I may want to put solar power on my property in the future.
- I like solar & wind power because they will bring **thousands of jobs** to Idaho.
- I would like to see a ^{better} **state incentive program** for installation of solar and/or wind.
- Idaho Power should continue to pay for power generated by customers; keep Schedule 84 that provides net metering.
- Idaho Power should embrace solar power because it reduces the need for power during the day when air conditioners are running the most.
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- Idaho Power should invest in more renewable energy and divest from fossil fuels.
- Idaho Power should reimburse the cost of a home owner's solar system because they reduce the need for more infrastructure (power lines, power plants, etc.).

Additional Message to Idaho Public Utilities Commission:

Signed: K Olsel Date: 8/19/17

Your Name: Kath Olsel

Address: 735 Bitterroot, P

City: Pocatello State: ID Zip: 83201

Email: olselkath@isu.edu

I acknowledge that submitting a comment in an open case constituent a public record under Idaho Code 74-101 (13) and all information provided by me on the is form is available for public and media inspection. My comment may be reviewed by the utility.

Cost Increase Proposed by Idaho Power for Customers with Solar or Wind Turbines

Citizen Comment to the Idaho Public Utilities Commission

P O Box 83720 Boise, Idaho 83720-0074; FAX: (208) 334-3762

Case Number: IPC-E-17-13

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2017 AUG 32 AM 9:08

IDAHO PUBLIC UTILITIES COMMISSION

My power company is Idaho Power

I want Idaho Public Utilities Commission to know:

- I want to keep solar and wind power **affordable** in Idaho.
- I may want to put solar power on my property in the future. *Don't call*
- I like solar & wind power because they will bring **thousands of jobs** to Idaho.
- I would like to see a ^{better} **state incentive program** for installation of solar and/or wind.
- Idaho Power should continue to pay for power generated by customers; keep *Schedule 84* that provides net metering.
- Idaho Power should embrace solar power because it reduces the need for power during the day when air conditioners are running the most.
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- Idaho Power should reimburse the cost of a home owner's solar system because they reduce the need for more infrastructure (power lines, power plants, etc.).

2017 SEP -1 AM 9:57

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Additional Message to Idaho Public Utilities Commission:

Signed: P. Phelps Date: 8/19/17

Your Name: Paula Phelps

Address: 1261 City Creek Rd.

City: Pocatello State: ID Zip: 83204

Email: _____

I acknowledge that submitting a comment in an open case constituent a public record under Idaho Code 74-101 (13) and all information provided by me on the is form is available for public and media inspection. My comment may be reviewed by the utility.

Cost Increase Proposed by Idaho Power for Customers with Solar or Wind Turbines

Citizen Comment to the Idaho Public Utilities Commission

P O Box 83720 Boise, Idaho 83720-0074; FAX: (208) 334-3762 32 AM 9:08

Case Number: IPC-E-17-13

My power company is Idaho Power

I want Idaho Public Utilities Commission to know:

I want to keep solar and wind power **affordable** in Idaho.

I may want to put solar power on my property in the future.

I like solar & wind power because they will bring **thousands of jobs** to Idaho.

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Idaho Power should reimburse the cost of a home owner's solar system because they reduce the need for more infrastructure (power lines, power plants, etc.).

Additional Message to Idaho Public Utilities Commission:

Signed: Clifford W. Ogen Date: 8/19/17

Your Name: Clifford W. Ogen

Address: 735 Bitterroot Drive

City: Pocatello State: ID Zip: 83201

Email: _____

I acknowledge that submitting a comment in an open case constituent a public record under Idaho Code 74-101 (13) and all information provided by me on the is form is available for public and media inspection. My comment may be reviewed by the utility.

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IDAHO PUBLIC UTILITIES COMMISSION

2017 SEP -1 AM 9:57

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