

## Diane Holt

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**From:** ted.weston@pacificorp.com  
**Sent:** Tuesday, February 20, 2018 9:27 AM  
**To:** Beverly Barker; Diane Holt; Matthew Evans  
**Subject:** Case Comment Form: Rocky Mountain Power Rocky Mountain Power

Name: Rocky Mountain Power Rocky Mountain Power Case Number: IPC-E-17-13

Email: ted.weston@pacificorp.com

Telephone: (801) 220-2963

Address: 1407 W. North Temple

Salt Lake City Utah, 84116

Name of Utility Company: Rocky Mountain Power

Comment: Rocky Mountain Power submits these public comments in the above-referenced matter to support the request that the Idaho Public Utilities Commission ("Commission") open a generic docket at the conclusion of this case with the intent to establish a compensation structure for customer-owned distributed energy resources ("DER") that reflects both the benefits and costs that DER interconnection brings to the electric system.

Idaho Power's application requested four items: (1) closure of Schedule 84, Customer Energy Production Net Metering, ("Schedule 84") to new service for residential and small general service ("R&SGS") customers with on-site generation after December 31, 2017, (2) establishment of two new customer classifications applicable to Residential and Small General Service customers with on-site generation that request to interconnect to Idaho Power's system on or after January 1, 2018, with no pricing changes at this time, (3) acknowledgement that smart inverters provide functionality that is necessary to support the ongoing stability and reliability of the distribution system by ordering the Company to amend its applicable tariff schedules to require the installation and operation of smart inverters for all new customer-owned generator interconnections within 60 days following the adoption of an industry standard definition of smart inverters as defined by the Institute of Electrical and Electronic Engineers ("IEEE"), and (4) commencement of a generic docket at the conclusion of this case to establish a compensation structure for customer-owned distributed energy resources ("DER") that reflects both the benefits and costs that DER interconnection brings to the system. While the first three items are specific to Idaho Power, Rocky Mountain Power fully intended to participate in the generic docket.

Rocky Mountain Power not intervening in this proceeding should in no way be construed that the company is not interested in or affected by DER. Rocky Mountain Power choose not to intervene in this proceeding because, for the most part, the requests in Idaho Power's application were specific to implementation of its tariff.

In 2012 Idaho Power filed an application with the Commission requesting modifications to net metering service. In its order the Commission acknowledged:

Under the current pricing structure, the Company pays net metering customers a full retail energy rate for the power they generate. However, the full retail energy rate is higher than the generation related revenue requirement embedded in rates. It includes cost recovery for all components of the Company's electrical system, including transmission, distribution, and customer-related costs. The Company says that paying the full retail energy rate to net metering customers enables net metering customers to unduly reduce what they pay the Company for its costs associated with the non-generation-related components of revenue requirement... We agree with the Company that net metering customers do escape a portion of the fixed costs and shift the cost burden to other customers in their class. However, we find that more work needs to be done to establish the correct customer charge for those who net meter.

In Order 32846, the Commission ruled that rate changes to net metering should occur as part of a general rate case. Idaho Power's pending application complies with that order and was filed to prepare new net metering customers for

future changes to net metering. The Commission did not rule that the determination of the compensation structure for customer-owned DER also needed to occur as part of a general rate case. Rocky Mountain Power agrees with Idaho Power that the investigation of a compensation structure is best suited to be addressed outside of a general rate case in a separate docket. Since all electric utilities and customers in the State of Idaho could be impacted by the final decision, Rocky Mountain Power urges the Commission to open a generic docket to investigate and establish a compensation structure for customer-owned DER in which all interested parties may participate.

In 2016 Rocky Mountain Power filed to modify its net metering program and the Commission ordered the company to file annual Net Metering reports. In Rocky Mountain Power's 2017 Net Metering report filed with the Commission on October 31, 2017, the company stated:

The current net metering pricing structure for customers with on-site generation does not reflect the cost of serving those customers, nor does it appropriately reflect the benefits and costs of interconnecting customer owned on-site generation to the system...The Company has witnessed rapid growth in its net metering service in recent years and has identified quantifiable cost shifts occurring between its residential net metering customers and residential standard service customers. Considering recent growth, the Company believes that future cost shifting between these customer groups will continue to increase substantially in the next few years if left unaddressed.

Participation in net metering programs is accelerating at an alarming rate largely due to inappropriate price signals from the net metering tariff. Rocky Mountain Power believes now is the time to carefully consider both the costs and benefits of distributed energy resources. A generic proceeding would be the most efficient and transparent approach to address these issues in Idaho.

Unique Identifier: 131.219.2.1

## Diane Holt

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**From:** kaylawinter1@gmail.com  
**Sent:** Tuesday, February 20, 2018 11:02 AM  
**To:** Beverly Barker; Diane Holt; Matthew Evans  
**Subject:** Case Comment Form: Kayla Winter

Name: Kayla Winter  
Case Number: IPC-E-17-13  
Email: kaylawinter1@gmail.com  
Telephone:  
Address:  
Boise ID, 83716

Name of Utility Company: City of Boise

Comment: Regarding the current net metering case I am asking the Commission to deny Idaho Power's application to move customers with on-site generation to a new schedule. Without fully considering the costs and benefits associated with distributed generation there is no evidence to support the need for this change. The majority of studies investigating the value of distributed renewable generation have determined that it provides great value to the grid and other customers. Before any changes to the current net-metering situation are considered it is in the public interest that the commission assure that the full range of costs and benefits are studied in a manner that fairly accounts for the benefits in addition to the costs.

Unique Identifier: 134.43.0.1

## Diane Holt

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**From:** tansey.john@gmail.com  
**Sent:** Tuesday, February 20, 2018 10:56 AM  
**To:** Beverly Barker; Diane Holt; Matthew Evans  
**Subject:** Case Comment Form: John Tansey

Name: John Tansey  
Case Number: IPC-E-17-13  
Email: tansey.john@gmail.com  
Telephone:  
Address:  
Boise ID, 83702

Name of Utility Company: Idaho Power

Comment: Regarding the current net metering case I am asking the Commission to deny Idaho Power's application to move customers with on-site generation to a new schedule. Without fully considering the costs and benefits associated with distributed generation there is no evidence to support the need for this change. The majority of studies investigating the value of distributed renewable generation have determined that it provides great value to the grid and other customers. Before any changes to the current net-metering situation are considered it is in the public interest that the commission assure that the full range of costs and benefits are studied in a manner that fairly accounts for the benefits in addition to the costs.

Sincerely,  
John Tansey

Unique Identifier: 134.43.0.1

## Diane Holt

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**From:** Jolene Bossard  
**Sent:** Tuesday, February 20, 2018 9:34 AM  
**To:** Diane Holt  
**Cc:** Beverly Barker  
**Subject:** FW: Consumer Assistance Form: Barbara Dawson, 208-886-1780, Idaho Power, Boise

Diane, I believe the Consumer filled out the Assistance Form instead of the Comment Form. This is for case IPC-E-17-13.

Jolene

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

**From:** Front  
**Sent:** Tuesday, February 20, 2018 8:01 AM  
**To:** Jolene Bossard <Jolene.Bossard@puc.idaho.gov>  
**Subject:** FW: Consumer Assistance Form: Barbara Dawson, 208-886-1780, Idaho Power, Boise

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

**From:** bdawson@groupon.com [mailto:bdawson@groupon.com]  
**Sent:** Sunday, February 18, 2018 10:57 AM  
**To:** Front <front@puc.idaho.gov>; Beverly Barker <Beverly.Barker@puc.idaho.gov>  
**Subject:** Consumer Assistance Form: Barbara Dawson

**Name:** Barbara Dawson  
**Email:** bdawson@groupon.com  
**Telephone:** 208-866-1780  
**Address:** 523 N Locust  
Boise Id, 83712

**Name of Utility Company:** Idaho Power  
**Contacted Utility:** No

**Complaint:** I simply wish to state my opposition to any changes in the "Net Metering" program. You need to ensure that solar power is affordable, that consumers should have the right to install solar without unfair charges or fees, and that you do not allow Idaho Power to establish a new set of net metering customers. But, most of all, it is the right thing to do.

**Unique Identifier:** 72.24.148.209

**Diane Holt**

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**From:** lvermeer85@gmail.com  
**Sent:** Monday, February 19, 2018 3:22 PM  
**To:** Beverly Barker; Diane Holt; Matthew Evans  
**Subject:** Case Comment Form: Lorena vermeer

Name: Lorena vermeer

Case Number: *PL-E-17-13*

Email: lvermeer85@gmail.com

Telephone:

Address: 18231 Niche Ln  
Caldwell Idaho, 83607

Name of Utility Company: Idaho Power

Comment: Investing in rooftop solar to control energy bills while supporting Idahos clean energy sector is important to me. Please maintain the net metering program as a simple and fair means to enable Idahoans to meet their own energy needs.

The PUC staff looked at the details and found no evidence to support Idaho Powers request to segregate solar customers. I agree.

Because I cant choose my utility, I rely on the PUC to ensure fair programs. Again, please maintain the current net metering program.

Unique Identifier: 34.239.144.208

## Diane Holt

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**From:** mpkovach@cableone.net  
**Sent:** Monday, February 19, 2018 3:09 PM  
**To:** Beverly Barker; Diane Holt; Matthew Evans  
**Subject:** Case Comment Form: Milan Kovach

Name: Milan Kovach  
Case Number: IPC-E-17\_13  
Email: mpkovach@cableone.net  
Telephone: 2088703289  
Address: 2960 W Joust St  
Meridian Idaho, 83646

Name of Utility Company: Idaho Power

Comment: I ask that the Commission reject the proposal offered by the Idaho Power Company (IPC) under case number, IPC-E-17-13. One must ask, to what purpose is the proposal offered, to what end are Net-Metering customers asked to be placed in a separate class? The only possible conclusion can be, is to isolate these separate class customers and request a separate rate increase at some point in the future.

During those times when Net-Metering customers generate surplus power, that excess power is routed back to the local grid, it allows IPC to furnish that energy to local customers without the use of an extensive grid system. As more and more customers turn to renewable energy, there will be more occasions where the added resource of excess locally produce energy, is available to IPC by Net-Metering customers and Community Generated Power. This would be extremely important during high demand periods and preclude the requirement for IPC to purchase additional power from external sources or to invest in extensive expansion of its grid system.

If in the future there is a request for a rate adjustment, for Net-Metering customers, or for the excess power that they provide to the grid, then let it be based upon an independent study. Data collected from the study should be based in part on the total cost of the electrical power generated by all producers and the benefit of selling that power. The cost of the study should be paid by the requester.

Unique Identifier: 24.119.202.170

## Diane Holt

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**From:** aaronvonlindern@hotmail.com  
**Sent:** Friday, February 16, 2018 5:36 PM  
**To:** Beverly Barker; Diane Holt; Matthew Evans  
**Subject:** Case Comment Form: Aaron von Lindern

Name: Aaron von Lindern  
Case Number: *IPC-E-17-13*  
Email: aaronvonlindern@hotmail.com  
Telephone: 2089181581  
Address: 4030 Patricia Ln.  
Boise ID, 83704

Name of Utility Company: Idaho Power

Comment: Regarding the current net metering case I am asking the Commission to deny Idaho Power's application to move customers with on-site generation to a new schedule. Without fully considering the costs and benefits associated with distributed generation there is no evidence to support the need for this change. The majority of studies investigating the value of distributed renewable generation have determined that it provides great value to the grid and other customers. Before any changes to the current net-metering situation are considered it is in the public interest that the commission assure that the full range of costs and benefits are studied in a manner that fairly accounts for the benefits in addition to the costs.

Sincerely,  
Aaron von Lindern

Unique Identifier: 75.167.171.227



## Diane Holt

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**From:** jamesdhunt67@gmail.com  
**Sent:** Monday, February 19, 2018 11:37 AM  
**To:** Beverly Barker; Diane Holt; Matthew Evans  
**Subject:** Case Comment Form: James hunt

Name: James hunt  
Case Number: *IPC-E-17-13*  
Email: jamesdhunt67@gmail.com  
Telephone:  
Address: 8990 W Cory Ln  
Boise Idaho, 83704

Name of Utility Company: Idaho Power

Comment: Investing in rooftop solar to control energy bills while supporting Idahos clean energy sector is important to me. Please maintain the net metering program as a simple and fair means to enable Idahoans to meet their own energy needs.

The PUC staff looked at the details and found no evidence to support Idaho Powers request to segregate solar customers. I agree.

Because I cant choose my utility, I rely on the PUC to ensure fair programs. Again, please maintain the current net metering program.

Unique Identifier: 54.161.150.98

## Diane Holt

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**From:** held3@earthlink.net  
**Sent:** Monday, February 19, 2018 12:13 PM  
**To:** Beverly Barker; Diane Holt; Matthew Evans  
**Subject:** Case Comment Form: Maria Held

Name: Maria Held  
Case Number: *PC-E-17-13*  
Email: held3@earthlink.net  
Telephone:  
Address: 240 W Concord St  
Middleton Idaho, 83644

Name of Utility Company: Idaho Power

Comment: Idaho Powers net metering program enables local citizens to support Idahos clean energy sector. Supporting this growing sector of our economic reduces the current reliance on out-of-state fossil fuels for roughly 50% of our electricity.

Investing in local solar power keeps more energy dollars in our communities and allows individuals to meet their own energy needs. Individual control and local economic growth are Idahoan values.

Please stand up for these values by maintaining the current net metering program.

Unique Identifier: 34.207.217.249

## Diane Holt

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**From:** lvermeer85@gmail.com  
**Sent:** Monday, February 19, 2018 3:22 PM  
**To:** Beverly Barker; Diane Holt; Matthew Evans  
**Subject:** Case Comment Form: Lorena vermeer

Name: Lorena vermeer

Case Number: 1PCE-17-13

Email: lvermeer85@gmail.com

Telephone:

Address: 18231 Niche Ln

Caldwell Idaho, 83607

Name of Utility Company: Idaho Power

Comment: Investing in rooftop solar to control energy bills while supporting Idahos clean energy sector is important to me. Please maintain the net metering program as a simple and fair means to enable Idahoans to meet their own energy needs.

The PUC staff looked at the details and found no evidence to support Idaho Powers request to segregate solar customers. I agree.

Because I cant choose my utility, I rely on the PUC to ensure fair programs. Again, please maintain the current net metering program.

Unique Identifier: 34.239.144.208