



**IDAHO
PUBLIC UTILITIES
COMMISSION**

Public Hearing

**IPC-E-17-13
Pocatello, Idaho
3/5/18**

WHAT DO YOU THINK?

If you cannot or do not want to testify in person at this hearing but want your opinion noted, please use the space below to write your comments. Add extra sheets as needed.

You may either hand this sheet to a commission staff member or mail it to:

IPUC, PO Box 83720, Boise, ID 83720-0074.

You may also post comments on our web site:

Go to www.puc.idaho.gov and click on the "Case Comment Form" link.

Why would a government protected monopoly require me to surrender my Constitutional right to a jury ~~trial~~ trial? I believe its because a ~~lobbyist~~ lobbyist can't get to the jury chambers.

This causes me to distrust Rocky Mountain Power at its highest levels. Its motives are not for Idaho or its freedom. Its workers at the local level are not included in this opinion. Thanks

Print Name Sean Bartsch

Sign Name 

Mailing Address 4545 Noonan Rd

Phone Number 435-770-3212

City and State Montpelier ID

Zip Code 83254



**IDAHO
PUBLIC UTILITIES
COMMISSION**

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Public Hearing

2018 MAR -7 AM 8:50

IDAHO PUBLIC
UTILITIES COMMISSION

IPC-E-17-13
Boise, Idaho
3/1/18

WHAT DO YOU THINK?

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To be truly serving Idaho's citizens, Idaho Power should be finding ways to make power available as cheaply & abundantly as possible, which means securely & with a view to the future, not just current profit margins. Singling out the customers who are trying to be forward looking & penalizing them with a separate, disadvantageous rate system is unethical & may be against the law. Getting more power from solar will not hurt customers or Idaho Power; it will serve both, by making power sustainable & with more solar power going into the grid, will make it less necessary to build new gas-fired plants. We can still keep gas for backup until a more clean & sustainable option emerges, but move ahead with growing use of the sun, & this will mean gains for everyone.

Print Name Julie Hoefnagels Sign Name Julie Hoefnagels
Mailing Address 4377 N. Johns Landing Way Phone Number 208-371-3857
City and State Boise ID 83703 Zip Code 83703

March 5, 2018

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2018 MAR -7 AM 8:50

IDAHO PUBLIC
UTILITIES COMMISSION

Commissioners
Idaho Public Utilities Commission
P.O. Box 83720
Boise, Idaho 83720-0074

Regarding IPC-E-17-13

Dear Commissioners,

In this written testimony I would like to add four thoughts that I left out of my verbal testimony March 1.

1) Idaho Power exaggerates when it suggests that net metering customers create a "wealth transfer" that is "not fair" to Idaho Power non-net metering customers.

In Exhibit No. 5 of Timothy Tatum's testimony in support of Idaho Power's filing, Figure 1 shows a "Net Metering Subsidy Estimate" of \$444 per year or \$37 per month.

When this subsidy is spread over 534,534 Idaho Power customers, each non-net metering customer is subsidizing each net metering customer \$0.0000692 per month. This about one ten-thousandth of a penny per month.

When the subsidy for the whole group of 1,468 net metering customers (\$54,316 per month) is spread over 534,534 Idaho Power customers, each non-net metering customer is subsidizing the entire class of net metering customers ten cents per month.

Net metering creates no financial burden on any customer.

2) With the increased fees and charges that we can reasonably expect Idaho Power to ask of net metering customers, I risk paying more with solar than I was before I installed solar. My Idaho Power bills averaged \$42 per month for the twelve months before I installed solar on my residential rooftop. In Adam Richins' guest opinion published August 13, 2017 in The Idaho Statesman, this Idaho Power vice president of customer operations wrote, "It costs...approximately \$65 per month in total- for Idaho Power to supply grid services to the average residential customer." If Idaho Power asked for and was granted \$65 per month from me, a solar net metering customer, I would be paying \$23 more per month after installing solar than I was before I installed solar. This feels unreasonable to me.

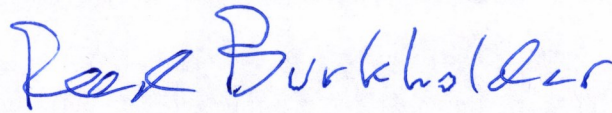
3) In the context of the world in which we live in 2018, a world with ever increasing greenhouse gases and increased climate mayhem, I would suggest that more incentives are needed for solar and I propose that net metering customers receive double the incentives beginning with the conclusion of this case. Instead of being credited one kWh

for each kWh generated in excess of usage, make it two kWh's credit for each kWh generated in excess of usage.

4) Many customers want clean, renewable energy, but Idaho Power gives us large amounts of coal and natural gas energy. Idaho Power's monopoly is not working for us. Perhaps we need deregulation- like Texans have. They can choose to get 100% of their electric energy from renewable sources. I would like that choice as well.

Please reject Idaho Power's request in IPC-E-17-13 for a new rate class occupied solely by net metering customers.

Thank you.



Reed Burkholder rburkholder2@gmail.com 208 323-8355
6105 Twin Springs Drive
Boise, Idaho 83709

Diane Holt

From: robeerun@aol.com
Sent: Wednesday, March 7, 2018 1:44 PM
To: Beverly Barker; Diane Holt; Matthew Evans
Subject: Case Comment Form: Rob Hanson

Name: Rob Hanson
Case Number: IPC-E-17-13
Email: robeerun@aol.com
Telephone: 2083830349
Address: 2061 E Feldspar Court, Boise
Boise ID, 83712

Name of Utility Company: Idaho Power

Comment: Dear Idaho Public Utilities Commission Thank you for the opportunity to submit our response to Case Number IPC-E-17-13 (Idaho Power's application to establish new schedules for residential and small general service customers with on-site generation).

Our names are Rob and Annette Hanson and we have a home in Boise, Idaho. We do have solar panels on our roof, so this proposed action directly affects our family.

Idaho Power (IP) argues that solar power owners through net metering don't pay their fair share of grid costs. However, IP doesn't credit solar owners for expanding power generation capacity. We expanded the system by 3000 kilowatts at our cost. Idaho Power's peak demand record occurred between 4 and 5 pm this past July 7. At that time we were not only producing enough power to meet our needs we were also sending electricity into the grid helping meet that demand. We did this all summer with the exception of six days. How can Idaho Power argue that we are a net detriment to other customers?

When we send electricity into the grid it can go to our next door neighbor with negligible grid loss compared to losses that occur when electricity is transported miles from a dam or power plant. Multiple studies performed by public utility commissions and others found that net metering is a benefit to all users. Google "Bookings Institute net metering" for a summary article with links to the studies.

Since we moved to Boise in 1989 we have striven to do everything right by Idaho Power and its energy conservation programs. We have paid into the Green Power program from its inception until 2013 when we installed our solar panels. We don't have a clothes dryer, have purchased energy efficient appliances, changed to LED lightbulbs, and have adopted other practices to reduce our electrical demand. We believe that we are continuing to be good stewards by installing solar panels. But now Idaho Power is saying we don't pay our fair share.

Adam J. Richins of Idaho Power stated in an August 11, 2017 Idaho Statesman Guest Opinion stated that it costs "— approximately \$65 per month in total — for Idaho Power to supply grid services to the average residential customer." Our Idaho Power bills before we installed solar panels averaged \$31 per month. So apparently we were being subsidized before we installed our panels. This doesn't make sense to me and raises a numerous questions about electrical rate pricing.

As brought up by a number of speakers who testified at the hearing, creating a separate class system is not allowed — not for the poor to give them a break, the rural farmer, or the expensive home in the foothills with huge windows, no wind breaks, and that needs extensive lines to receive their power.

We are relying on the Idaho Public Utilities Commission and its technical staff to sort through Idaho Power's claims about their proposed rate changes. It seems like Idaho Power should look at home solar power owners as a partner in supplying a stable supply of electricity to its customers. Pricing and managing a smart grid incorporating renewable energy is complex and will benefit us all. Counting all costs and benefits will be critical to getting it right.

Thank you for your time and leadership in regulating our utilities for our future.

Unique Identifier: 24.117.133.249

Diane Holt

From: Tutled31@yahoo.com
Sent: Wednesday, March 7, 2018 1:25 PM
To: Beverly Barker; Diane Holt; Matthew Evans
Subject: Case Comment Form: David Tuttle

Name: David Tuttle
Case Number: IPC-E-17-13 83201
Email: Tutled31@yahoo.com
Telephone: 2082290114
Address: 4095 W. Miners Farm Drive
Bise Idaho, 83714

Name of Utility Company: Idaho Power

Comment: Idaho Power's claims are not valid. The cost benefits to Idaho consumers who use roof top solar are beneficial to all Idaho citizens.

Unique Identifier: 45.33.220.23

Comments to the IPUC

Idaho Power Case IPC-E-17-13

March 7, 2018

Hello, my name is Paul Hatab. I have been an Idaho Power customer for more than 30 years.

I would like to thank the IPUC commissioners for holding the public hearing in Boise on Thursday, March 1, 2018. You were all very attentive and respectful. Between the testimonies that night and all the online comments, you have heard many cogent reasons to reject this proposal from Idaho Power. So I will not restate those arguments.

But one observation struck me at the public hearings that I would like to share.

Every single testimony at the public hearing was passionately against this proposal. I was somewhat surprised at this as Idaho Power has tried to portray the PV (photovoltaic) home owners as a privileged subgroup trying to “cost shift” some of their fixed costs to other customers. On August 13, 2017, Idaho Power Vice President Adam Richins wrote a Guest Opinion in the Idaho Statesman in which cost shifting was highlighted as the primary motivation for this proposal. He argued that the net-metering customers were causing higher prices for the other customers. Therefore, I was curious whether any upset Idaho Power customers would testify in support of the proposal and against the “unfair” cost shift. But no public testimony was offered in support of the Idaho Power proposal.

A few thoughts about Idaho Power’s claim of cost shifting.

First, until the cost-benefit analysis is done, I do not accept that any cost shifting is occurring. It could turn out to be a “savings shift”. The PV installations may delay (or eliminate) the need for new capacity. Has Idaho Power ever built new capacity and not have it cost the ratepayers something? It is unfortunate that Idaho Power used this claim (of cost shifting) which promotes divisiveness among Idaho Power customers.

Second, as several people have noted, if doing something to use less electricity behind the meter is cost shifting, then it is happening all the time. Let me give you an example to demonstrate. The slide at the end of this letter estimates the monthly reduction in kWh (kilowatt hours) by the approximately 1400 PV homes (if each home had a 10 kW system, which is probably larger than average). These are the kWh for which PV homes no longer pay 9.5 cents. Since approximately 6 cents of the 9.5 cents per kWh goes to fixed costs, Idaho Power argues that someone else has to pick up that cost. But let’s compare this reduction to the potential reduction created by an Idaho Power program. The Idaho Power “Energy Savings Kit” is a great program that Idaho Power provides to customers for free. If only 25% of the Idaho Power customers took advantage of the 9 free LED bulbs in the kit, and replaced incandescent bulbs (say 60 watt bulbs), then as the slide shows, the monthly reduction in kWh would be 3 times the amount generated by all 1400 PV homes! Reduction in consumption should not be considered cost shifting. It helps us all! In either case, if Idaho Power loses any revenue, they have several avenues available to recover and redistribute this amount.

Idaho Power should be applauding the PV efforts just as they would any other conservation effort. We are some of their most committed and involved customers. I personally had a rooftop PV system installed in 2017. I would have preferred to participate in the Idaho Power Community Solar Program if it had been at least a reasonable investment. Idaho Power would never ask an investor to invest for 25 years with a zero (to possibly negative) return. I am also a participant in the Empowered Community program that provides customer feedback to Idaho Power. There are many good people working at Idaho Power who were very helpful and encouraging during the Community Solar project. I would like to commend them for their efforts. I hope that the Idaho Power management can learn to embrace our PV homes as partners rather than threats. We would prefer to work together with Idaho Power to promote clean, reliable and low-cost energy!

Thank you for your consideration and I encourage you to deny this request.

Sincerely,

Paul Hatab

2001 N. 18th Street

Boise, Idaho 83702

208-343-3731

hatabs@msn.com

Cost Shift by Reduced Usage?

<u>PV Homes</u>	<u>Idaho Power Energy Kit Users</u>
<p>Assumptions:</p> <ol style="list-style-type: none"> 1) 1400 homes have PV systems. 2) The 1400 homes have, on average, 10-kW systems. 3) 10-kW systems generate, on average, ~ 1200kWh per month 	<p>Assumptions:</p> <ol style="list-style-type: none"> 1) Customer gets 9 free LED light bulbs. 2) Each LED replaces a 60w incandescent bulb and saves 50w per hour. 3) Each bulb is used 3 hours per day. 4) Monthly household savings: 9 bulbs x 50w/hr x 3 hrs/day x 30 days = 40,500wh = ~ 40 kWh per month. 5) If 25% of Idaho Power customers (500,000) use this free program:
<p>Generation (<u>reduced usage</u>) per month:</p> <p>1400 homes x 1200 kWh per month =</p> <p>1,680,000 kWh per month reduced usage</p>	<p><u>Reduced usage</u> per month:</p> <p>500,000 x .25 x 40 kWh per month =</p> <p>3x!! 5,000,000 kWh per month reduced usage</p>

Anna Owsiak
7505 W. Portneuf Rd
Pocatello, ID 83204

I do not support Idaho Power Company's request to charge net metered customers differently than other customers.

Idaho Power has not shown data that supports the need for their request. I am not against paying my fair share for use of the infrastructure for energy delivery and use, however, I want to know that it is a fair share and not an arbitrary one. At the very least IPC needs to do a comprehensive analysis of costs involved and demonstrate the need based on those costs, and preferably, it should be an independent analysis and cost determination.

As an energy consumer, I should have a choice about how and where to spend my energy dollars. I believe in supporting Idaho and Idaho industry, and the clean energy industry in Idaho is growing. Currently Idaho imports about half of its power, and I would rather see my dollars go to supporting local Idaho clean energy industry and increasing its capacity and use, than supporting the importation of coal produced energy. I also want my dollars used to support clean energy that enhances Idaho's energy security and does not contribute to greenhouse gas emissions and a changing climate.

As proposed, I feel IPC's request arbitrarily singles out the few clean energy users of the state for punishment. Instead of punishing energy users who are trying to make a positive change on multiple levels, IPC should be looking for ways to enhance and support increased clean energy development in Idaho.

Thank you for the opportunity to provide testimony.
Anna Owsiak



Diane Holt

From: teandreae1@yahoo.com
Sent: Tuesday, March 6, 2018 8:12 PM
To: Beverly Barker; Diane Holt; Matthew Evans
Subject: Case Comment Form: Tim Andreae

Name: Tim Andreae
Case Number: IPC-E-17-13
Email: teandreae1@yahoo.com
Telephone: 208 424-6821
Address: 403 OFARRELL ST
Boise ID, 83702

Name of Utility Company: Idaho Power

Comment: In defense of affordable solar energy in Idaho, Idaho Power should not be allowed to place customers who use solar, wind or micro-hydro in a separate rate class. Clearly, if they do this the intent is to raise the rates at a later time. This kind of action that runs contrary to to any kind of sound judgement regarding the bigger picture of our collective future. Killing solar by making it uneconomic for customers would be a terrible business move. Instead of trying to over-control a tiny portion of their solarized customer base (.25%), Idaho Power should embrace distributed energy - like Green Mountain Power in Vermont - and learn how to profit from it.

Unique Identifier: 174.27.23.249

Diane Holt

From: geneemcgill@gmail.com
Sent: Tuesday, March 6, 2018 4:42 PM
To: Beverly Barker; Diane Holt; Matthew Evans
Subject: Case Comment Form: Gene McGill

Name: Gene McGill
Case Number: IPC-E-17-13 83201
Email: geneemcgill@gmail.com
Telephone: 619.248.2373
Address: 2430 W Cherry lane
Boise ID, 83705

Name of Utility Company: Idaho Power
Comment: TO: Idaho Public Utilities Commission
FROM: Gene McGill, CPA & CGMA
2430 W. Cherry Lane
Boise, ID 83705
SUBJECT: Comment on IPC-E-17-13 83201
DATE: March 6, 2018

BACKGROUND

Idaho is developing several solar electric solutions to address the negative impacts of burning fossil fuels. Due to the robust population growth in Boise, the need for affordable and effective alternative energy solutions is expanding. Residential solar rooftop panel systems are increasingly attractive investments when coupled with the improved "Tesla Home Battery" which charges during the day and provides power for appliances when the sun is not available. Solar also has an advantage over renewable hydro power because it avoids the detrimental impact to native fish species.

SITUATION

Idaho Power contends that the current net metering rate structure for residential and small generation service (R&SGS) customers with on-site generation does not reflect the cost of servicing those customers, nor does it appropriately reflect the benefits and costs of interconnecting customer-owned on-site generation to Idaho Power's system. Idaho Power is requesting that the PUC grant approval for creating a new rate classification for customers who install on-site generation and interconnect with Idaho Power's system.

IMPLICATION

It appears that Idaho Power is applying an incorrect analysis to derive their position that net metering rates are unfair to other users and do not bear a full cost share of system costs. I would argue that all cost saving projects should only bear the actual costs of the investment to achieve the new and improved circumstance. In the case of solar rooftop panel systems, the customer cost should include the cost of the net metering tool (the device and/or software that allows the solar customer to adjust external electric flows) as well as their personal investment in panels and batteries. However, the historical capital investment by Idaho Power in system delivery and billing software systems are an unfair burden to the solar generating customers who are investing in systems reduce fossil fuel emissions and overall use of the existing delivery system. The fact that all customers may bear a small increase in total existing system costs as a result of applying the fixed cost (non-variable prior sunk cost) to fewer system outputs is irrelevant to the sub-set of solar rooftop panel customers. Said another way, it is fair to periodically adjust the rate that all customers (including solar rooftop panel customers) bear whenever the rate of fixed system delivery costs change due to long term changes in energy usage. It is an arbitrary accounting policy for Idaho Power to impose a special cost share of capital expenditures that were committed long before a selected class of customers created an opportunity for system wide cost reductions.

More specifically, total maintenance costs for the delivery system will be reduced as more solar customers reduce their use of the system. Lower maintenance costs will offset the higher per capita sunk cost recovery such that a periodic rate adjustment for all customers may not be warranted.

RECOMMENDATION

Idaho Power's request for a special new classification for customers who install on-site generation and interconnect with Idaho Power's system should be denied. Such a rate class would be unfair and burden the residential solar customers with a higher share of a capital cost that was incurred based on justifications unrelated to rooftop solar energy systems. Any per rata historical capital cost increase that Idaho Power documents as a result of the deployment of solar electric solutions should be attributed to all Idaho Power customers.

OBSERVATION

Based on review of the web site, the Idaho Public Utility Commission has an obligation to ensure to serve consumers/customers. I would suggest that an important service to Idaho utility consumers is to continue to support the advancement of renewable solar energy. The proposed new rate classification for customers who install on-site generation and interconnect with Idaho Power's system contradicts the goal to advance renewable solar energy. The proposed new rate classification is also a policy contradiction with the Federal tax credit and the Idaho state tax deduction for residential solar investment.

Kind regards,

Unique Identifier: 159.118.165.136

Diane Holt

From: darin.letzring@gmail.com
Sent: Wednesday, March 7, 2018 8:30 AM
To: Beverly Barker; Diane Holt; Matthew Evans
Subject: Case Comment Form: Darin Letzring

Name: Darin Letzring
Case Number: IPC-E-17-13
Email: darin.letzring@gmail.com
Telephone: 208-705-7718
Address: 53 Duke St
Pocatello ID, 83201

Name of Utility Company: Idaho Power

Comment: I am writing to comment on net metering with Idaho Power. I am not against fair compensation for Idaho Power to maintain a grid in our area. I want to establish how this program has changed over the years from my viewpoint and recommend ways that this program can again become more about a smart future for the state of Idaho.

When I installed 5kw of solar on my home in 2010, I was excited to be part of a power solution that didn't include large infrastructure such as power plants and dams on our beautiful rivers. My conservation efforts have been turned upside-down by Idaho Power and PUC. When I previously got a check for only approx. \$75 per year for excess production of electricity, it represented a minimal financial return on my investment; I did not install solar to "make money." Several years ago when PUC approved credits in lieu of cash, a true irony of my efforts came to fruition. Rather than conserving electricity, my solar panels became a symbol of excess. I can't give my credits to less-fortunate people who can't pay an electric bill and I can't get cash for the electricity I pay, so I make sure I use the electricity credits. My family now cranks up the air conditioning in the summer and totally wastes all the benefits of the solar electricity created. It is an absurd result of the continuing changes of the program.

My efforts to conserve electricity have become worthless outside of not having to pay an electricity bill each month. I can't even give my electricity credits to some charitable cause to help people less fortunate than me.

I encourage the PUC to review this whole case that includes the wise use of the electricity created by individual solar power rather than simply focusing on recouping infrastructure costs from all-size solar projects.

Options include providing a charitable-giving concept for electricity credits (Idaho Power could possibly find cost-savings with this by off-setting losses in this category), limiting large-scale solar projects that greatly skew the impact of individual home solar, and providing logical data that sets a cost for individual support for infrastructure.

Let's set a smart course for the future of Idaho by opening the thought process to include creative solutions that "find money" for Idaho Power in places other than the individual solar owners' bank account.

Thank you,
Darin Letzring

Unique Identifier: 164.165.193.111