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IDAHO PUBLIC
UTILITIES COMMISSION

January 10, 2020

Idaho Public Utilities Commission
PO Box 83720
Boise, Idaho 83720-0074

Re: IPC-E-18-15

Members of the Commission;

I am a residential rooftop solar producer who is grandfathered pursuant to the terms of the 12/20/19 Order for the system I installed 2-3 years ago. I intend to expand my current system by five panels to accommodate an electric vehicle. I did not make a financial commitment on this expansion on or before 12/20/19. I concede that the expansion I propose would not be grandfathered. I did make a financial commitment to my installer before the end of 2019, in order to take advantage of 2019 federal tax credit.

Idaho Power (IPC) has contacted me to talk about my plans. In the course of our discussion I learned that IPC takes the position that if I expand my current system I will lose grandfathered status for my ENTIRE system. I have again reviewed the Order and do not believe that IPC's interpretation is correct. In pertinent part the Order reads: "...[W]e are grandfathering the customer at the meter site at the originally installed nameplate capacity of the system. We are not grandfathering the system...." It seems to me that the Order unambiguously gives the grandfather right to the customer for the capacity that existed as of 12/20/19. I see nothing in the Order that supports IPC's stated position that my right to grandfather that pre-existing capacity evaporates if I add to it. Of course, I recognize that the new capacity must follow rules for systems installed after 12/20/19. However, I fail to see how that should affect the rights the Commission established for my existing generation capacity.

I recognize that there is only one meter at my residence, and this may present some difficulty in treating power produced by a mixed system. However, if my current system capacity is 20 panels, and I am adding 5, it seems that some simple rule could be established to define what percentage of my power generation should be subject to the grandfathered export credit rate.

I ask for clarification on this point. In the alternative, if you share IPC's view on this issue, I ask that you reconsider your 12/20/19 Order. I would do this by way of formal pleading, but time is tight, and I only learned of IPC's position in the last hour.

Yours Very Truly,

A handwritten signature in dark ink, appearing to read "Tom Baskin", written in a cursive style.

Thomas Baskin

Cc: Idaho Power