

Diane Holt

From: ktinsv@cox.net
Sent: Tuesday, November 12, 2019 5:10 PM
To: Diane Holt
Subject: Case Comment Form: Kiki Leslie A Tidwell

Name: Kiki Leslie A Tidwell
Case Number: IPCE1815
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Name of Utility Company: Idaho Power

Comment: In a world where the climate action mantra has shifted to all-electric-everything, there are incredible opportunities for an electric utility; think of the new streams of income off just electric cars and buses. Even much-hated PGE in California now is advertising an electric fleet incentive program for trucks. Idaho Power could be making tons of money by building their own solar and wind farms. Instead they are spending their time on wresting small streams of pennies difference from residential and small commercial customers who have put solar on their roofs. There comment is regarding the proposed settlement in the Idaho Public Utilities Case for solar net metering. As feared, most small commercial and residential solar panel owners will take the brunt of these changes in net metering starting in January 2020. Instead of being able to make more solar power one day than one uses (sending the rest to the grid) and keep the credit at your same retail rates for another day, you will now get compensated at a lower rate per kWh if you don't use all the energy you generate that hour. And don't even get me started with the calculations that are going to go into how that new lower rate is calculated,

"Net Hourly Billing. At the end of each hour, consumption and exports within the hour will be netted and net hourly exports will be compensated at the Export Credit". "Methodology to Determine the Export Credit Rate. The Export Credit Rate will be based on the value of exported energy from all solar photovoltaic ("PV") customers in each class, and will be applicable to all distributed generation ("DG") resources taking service under Schedule 6 and Schedule 8. Signing Parties recognize the exported energy value may be different for other DG resources. Parties retain the right to advocate for export credit rates specific to other DG resources in future proceedings. The methodology to determine the Export Credit Rate will be:...1. Avoided Energy Value. The energy value will be the two-year levelized energy-weighted average of the Demand Side Management ("DSM") Alternate Cost obtained from the pricing periods set forth in the most recently acknowledged Integrated Resource Plan ("IRP") calculated as the summation of the product of hourly energy exports and the DSM price divided by Total Annual Energy Exports for the class."

In the scheme of their entire generation portfolio, Idaho Power's income from this difference is minutely tiny, but they are going to create an accounting nightmare for themselves to track it all while creating hardship for those homeowners who scraped together the funds to put solar on their roofs. Maybe in order to change our utility's culture to look for the opportunities in clean energy rather than seeing us as the enemy, we need to first look at changing the culture of our Public Utilities Commission, which tells this investor utility what it can do. Maybe we should restrict PUC members to only those who have not previously taken campaign funds from Idaho Power. <https://www.utilitydive.com/news/3-state-commissions-upending-the-way-utilities-do-business/563949/>, Speaking of PGE, there have been more transmission-caused fires in both Northern and Southern California, more pre-emptive power outages for millions, more lost business, more lost homes, and many displaced families. We can take notes and prepare. <https://www.cbsnews.com/news/after-pg-e-blackouts-california-homeowners-move-to-solar-and-batteries/>. Climate change is affecting not only California, but Idaho as well; we're not immune to similar scenarios with

our transmission grid. The solution is non-wires solutions; solar on residential and small commercial roofs being part of resiliency. Do not accept this proposal.

Unique Identifier: 164.165.206.42

Diane Holt

From: rfisher77@gmail.com
Sent: Tuesday, November 12, 2019 9:09 PM
To: Diane Holt
Subject: Case Comment Form: Ryan Fisher

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Name of Utility Company: Idaho Power
Comment: Idaho Public Utilities Commission (PUC)
11331 W Chinden Blvd
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Ryan Fisher
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Boise, ID 83706
208-368-1687
November 12, 2019

To the Idaho PUC,

I am writing to provide my input as a Boise resident and net-metering customer of Idaho Power who has on-site solar generation. I urge you not to approve the proposal by Idaho Power to the Idaho PUC in case number IPC-E-18-15.

In this case, Idaho Power has filed a request with the Idaho PUC to change how net-metering customers are compensated for the power they generate on-site, significantly reducing the value of the power generated by net-metering customers. The compensation rates for power generated by net-metering customers is a key factor in determining if on-site solar generation is going to be a reasonable investment, myself included. Reducing compensation rates for existing net-metering customers causes a significant financial detriment to all existing net-metering customers.

If Idaho Power's proposal to the Idaho PUC is approved, new rates will be as follows for residential (Schedule 6) customers as outlined by Idaho Power in a 10/23/19 mailed letter to their net-metering customers:

- Approximately 8.7 cents per kilowatt hour (kWh) starting 1/1/2020
- Four incremental decreases in compensation per kWh in 2022, 2024, 2026 and 2028, with the proposed final credit rate in 2028 of approximately 4.4 cents per kWh

The proposed rate decreases by Idaho Power significantly reduces the value of net-metering residential solar systems and significantly increases the time it will take to recover a solar power investment. Compensation for the power generated by net-metering customers is a key component of the decision to invest in residential a solar power generation system. Any decrease to that compensation credit significantly pushes out that time period and makes the

investment less appealing. The decreases in the amount of compensation per kWh that Idaho Power is proposing could make a potential net-metering customer consider not investing in on-site solar generation at all.

In my case, if the proposed net-metering rate changes proposed by Idaho Power were approved, it would delay the payback time for my on-site solar system from approximately 13 years to more than 23 years – nearly doubling! And this does not account for the possibility of additional rate reductions. Idaho Power’s proposal does not detail compensation rates for net-metering customers for years 2022, 2024, or 2026, only that they would decrease from 2020 proposed compensation rates. There are also not any provisions discussing whether compensation rates for net-metering customers would remain steady or perhaps continue to decrease below the proposed 2028 final credit rate of 4.4 cents per kWh. Assuming the price of power will continue to increase over the years to come, the conditions above could present the case that a current net-meter customer’s investment in a solar system may never end up paying for itself.

One of the primary responsibilities of the Idaho PUC is to ensure that discriminatory rates will not occur to utility customers. However, permitting Idaho Power’s proposal to proceed as-is would significantly impact current utility customers’ solar investments in a negative manner and would also be discriminatory towards all current net-metering customers. Therefore I will reiterate, my position is that the Idaho PUC reject case number IPC-E-18-15 in its current form.

There is precedent that other utility companies around the country have sought to change the methods that various forms of net-metering customers are compensated. However, it can be done in a manner that is not discriminatory towards current net-metering customers, perhaps allowing existing customers to be grandfathered at their original agreed and acted upon compensation rate terms. Two recent examples among many were with the Arkansas Public Service Commission in 2017 (<https://arkansasadvancedenergy.com/2017/03/15/in-win-for-solar-psc-allows-grandfathering-for-net-metering-customers/>) and the Kentucky Public Service Commission in 2019 (<https://dailyenergyinsider.com/news/21618-kentucky-psc-allows-more-time-for-comments-on-new-net-metering-rates-for-electric-utilities/>).

I request the Idaho PUC follow the commonsense, ethical, and fair example set by other Public Service Commissions and Public Utility Commissions across the country in regards to how current net-metering utility customers are compensated for power they generated when any negative change to that compensation structure by:

- Allowing all existing net-metering customers to stay on the existing (2019) net-metering program and apply any new program changes to only new net-metering customers.
- Applying any revised net-metering rates only to new net-metering customers, allowing those new customers to properly weigh their options.
- Respecting the financial investment in existing on-site power generators.
- Considering that this would also address Idaho Power’s desire to modernize its compensation structure for future net-metering customers. As current net-metering customers sell their properties or replace their systems, the new owners would be subject to the rate structure in place at that time.

Thank you for your time in this matter. Please feel free to contact me if you have any questions.

Sincerely,
Ryan Fisher

Unique Identifier: 164.165.206.42