

Diane Holt

From: merr-s@hotmail.com
Sent: Monday, November 11, 2019 5:18 PM
To: Diane Holt
Subject: Case Comment Form: Merrilee Stevenson

Name: Merrilee Stevenson
Case Number: IPC-E-18-15
Email: merr-s@hotmail.com
Telephone:
Address: 2030 E 3050 S
Wendell ID, 83355

Name of Utility Company: Idaho Power

Comment: Greetings:

We recently received a letter from Idaho Power Company informing us of a settlement agreement between Idaho Power and the Idaho Public Utilities Commission regarding proposed changes to the billing structure to residential solar users. Our understanding is that Idaho Power is requesting this change as they believe home owners with solar have an unfair billing advantage over customers without solar. In talking with friends and neighbors there has not been concern voiced that solar users are receiving an unfair advantage knowing that Idaho Power did not subsidize our conversion to solar, in fact there is dismay in conversation that Idaho Power is proposing to financially punish those customers that have been able to take steps to reduce the demands on other fuels that contribute to an unhealthy environment. In addition, as the days shorten or there is substantial cloud cover solar home owners may not have enough credits to offset power usage and are then billed accordingly.

We are writing to urge the Idaho Public Utilities Commission to rule against Idaho Power and exempt by grandfathering current residential solar customers who provide on site solar generation from the settlement structure. We would request to continue the current net metering structure for all current solar clients unchanged without restriction of time (years) as the only fair solution to Idaho Powers proposed request as there is not convincing evidence that solar users have an unfair billing advantage.

As you are aware, installing solar is a significant financial commitment for homeowners and one that we made after a great deal of research and most importantly understanding the impact net metering would have on our monthly power bill with the understanding that it will take years for us to achieve a true return on our investment. The cost of the initial outlay of the system made sense upon understanding Idaho Powers net-metering structure. While doing our due diligence before making the decision to proceed with adding solar to our home we spoke with an Idaho Power representative to understand how our billing would be affected. We believe had Idaho Power been forthright in explaining their pending proposal we would not have moved forward with solar installation as it makes little financial sense even with the State and Federal tax incentives as the return on our investment could potentially extend beyond the life of the solar panels. During our conversations with Idaho Power we were given ideas on additional energy conservation techniques for our home which we initiated and believe we were encouraged by Idaho Power and their written resources that solar would be a positive step in controlling our costs as we transition to retirement.

In addition, Idaho Power has been marketing their goal to achieve 100% clean energy by 2045 which lead us to believe Idaho Power was in full support of home owners converting to solar in support of their mission and to the long range health of our beautiful state in reducing a carbon foot print. To date our system has provided environmental benefits of 18,306.04kg Co2 emissions saved or the equivalent of 1,015 trees planted. This amount may not sound like much but putting the cost of installation aside we have been excited to be able to do our small part in making positive change to the environment for benefit of future generations. We would deeply appreciate your consideration of Grandfathering current home owners with solar WITHOUT restriction of time/years or a tiered billing system. If the predictions for population growth in Idaho is on target then please consider the current residential solar customers will be a very small

percentage of customers to Idaho Power and their bottom line which appears to be the driving force behind their request to change the way solar customers are billed.

Thank you for your time and consideration, Allen and Merrilee Stevenson

Unique Identifier: 164.165.206.42

Diane Holt

From: jan@brinkerhoff.net
Sent: Sunday, November 10, 2019 12:38 PM
To: Diane Holt
Subject: Case Comment Form: Jan Brinkerhoff

Name: Jan Brinkerhoff
Case Number: IPC-E-18-15
Email: jan@brinkerhoff.net
Telephone:
Address:
Boise Idaho, 83716

Name of Utility Company: Idaho Power

Comment: When I last visited, the Idaho Public Utilities commission (IPUC) approved new schedules for small general service customers with on-site generation that request to interconnect to the Idaho Power (IP) system, presumably to segregate them for data collection, analysis and future rate and connection considerations. At the same time, IPUC initiated a docket to comprehensively study the costs and benefits of on-site generation and approved a new requirement for the installation and operation of smart inverters, which is pretty much a no-brainer as this benefits everybody.

Initially it all sounded like a good idea. After all, I (like many others) need the grid despite the fact that I have been net zero in kWh usage for over 2 years. The grid has value, and I don't mind paying my fair share for this vital part of my mission to reduce my individual carbon footprint. Renewable energy from the sun (which in the end powers everything on earth) seems like one of the best way to help save the planet at this point in history (however - check back in 25 years). I produce and export energy during the day and draw energy during the night since the sun rarely shines at night! Unfortunately, the Agreement currently being considered clearly states that saving the planet has no value. Specifically it says:

"Parties recognize there may be environmental benefits of distributed on-site generation systems. The methodology to determine such benefits is not part of this Settlement Agreement, but Parties retain the right to advocate for a methodology to determine such benefits in a future docket.". (section IV-B-6)

In other words "not my problem". It begs the question: If environmental concerns in the production and distribution of energy is not IPUC's problem, then whose problem is it? Since I was unable to find an IPUC Mission Statement, I'll assume it doesn't mention advocating for sustainability, or representing the peoples interest, or checks on a private business that is allowed to operate as a monopoly with a guaranteed profit? So maybe it isn't IPUC's problem. But make no mistake, it is a problem.

As previously stated, I have no issues paying for grid access. I doubt you will find very many Photovoltaic (PV) System owners who would actually object. The problem is the method, and the formula used to determine energy value which apparently is:

"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.". (section IV-B-1)

What??? Being a simple minded individual without a comprehensive understanding of electric generation, transmission, distribution, load balancing and delivery, I have to look at it from 30,000 feet (more like a big picture view). So, in simple terms, I believe IP takes in a bunch of money, pays out a bunch of expenses, accumulates certain reserves and delivers a reasonable profit to shareholders. I assume included in expenses is all kinds of stuff, including payroll, power plant construction/maintenance, administration, operations, bunch of stuff I don't know about, and construction and maintenance of their grid. The grid apparently includes conversion, transformation, transmission, distribution, and delivery of energy in the form of electricity to customers. With that in mind, I assume that IP dedicates about 50% of their total income to grid construction, operation and maintenance. Is that correct? I assume this because according to attachments with the agreement, they want to pay (or collect – depending on your point of view) 50% of the current retail value of excess energy produced by PV systems to offset grid costs. Maybe this similar to what IP pays when they buy power on the open market? Even if so, IP does not have to convert, transform, or use high voltage transmitting for this local solar power due to pooling type delivery. If IP can purchase power from other sources cheaper (which I suspect they can), I can't! Again, IP is allowed to operate as a profitable monopoly. Is that worth anything? Perhaps IP should pay their own customers a little more than wholesale market for energy since it helps meet their environmental generation goals, as well as national goals.

PV customers should not pay a premium for grid access – assuming they are using smart inverters which are required in order to connect. Obviously, due to the nature of AC power, IP sells my excess energy immediately as it is produced. The credit I get represents energy that IP delivered to it's customers but did not produce (or buy – or transmit outside my neighborhood). Also, I don't remember IP making any investment in the construction of my PV system when I put it up and I'm not expecting them to do any maintenance. At any rate, I get to use my credits at night during much lower demand for IP. Sometimes, especially on snowy winter days, I can't produce enough to cover my own demand, so I use power (via credits) from the grid in those situations as well.

I have to wonder what other methods were considered to insure that PV owners pay their fair share of the grid costs and prevent what IP calls a wealth transfer. As it stands now, in my situation, I basically use IP for energy storage (my 'battery' so to speak). There are examples from other industries that could be used to compensate IP for it's grid. The obvious one is data storage (which in this case the customer would pay for energy storage on the grid instead of data storage on internet).

If the cost of IP grid operations actually represents 50% of the price of the energy IP sells, and environmental concerns have no value, then this proposal may be reasonable. However, I have my doubts on both of these. If it is intended to make a profit on PV systems, or discouraging new installs while acting like they want people to conserve, then it does represent a wealth transfer, just not the one IP was publicly concerned about.

Being a lifelong Idaho native born in Boise, I must say that I have dealt with IP for many, many decades at many Idaho locations. I have always found IP to be an exceptional company with truly exceptional employees and service. I hope IP continues to recognize their unique role and their place in Idaho, and this country, and continue their rich tradition of service and innovation. Energy has always changed and will continue to change (think whale oil and coal) so it may be good to act proactively toward the future and not be as concerned with maximizing profit today.

As it is, fair or not, the net effect of this agreement will be to stifle new homeowner PV installs going forward. Is that what we want to do? The standard pitch from solar salespeople is to offset the cost (actually pay the cost over time) of the PV system by using energy you produce from the sun hitting your roof instead of paying for energy from the power company (along with a side of tax credit reflecting national will to generate energy from clean sources). Offsetting costs will no longer be possible given the time required to recoup costs, and the useful life of the PV system itself. This agreement, like Nevada's and/or other regulatory authorities, appears to be an attempt to keep profitable solar production in the hands of the power companies (have you seen any of IP's solar installs? Impressive!) instead of individual citizens.

On the other hand, there's always the rule of unintended consequences. The unintended consequence in this case could very well be realized in a boom for energy storage and even larger PV systems. The rapidly changing battery (and other

energy storage) industries will likely find a way to deliver affordable storage solutions to homeowners. When that happens (and we're getting way closer), the new PV systems installed will be larger, and the storage systems far more robust. That's when power companies (including IP) will see people disconnecting from the grid all together. In fact, I would not be surprised if IP starts to see more people disconnecting than new services coming on within the next decade – even if it costs a little more to be independent. You may also see, as a result of better storage options, a requirement in building codes (or a requirement via market driven forces) that new construction include energy production systems on the house itself (like PV). You see, most people, especially younger people, think the environment “is” their problem and they must deal with it. Again, a serious deal for people 35 and younger since most of them plan to be alive in 2050 and beyond.

With regards to existing customers. I'm not sure the grandfathering of existing customers is a make or break deal – except maybe in perception. People change residences, die, move for jobs, change service and all kinds of things. If grandfathered, the majority of grandfathered accounts will go away reasonably quickly anyway as accounts close or change (current net-metering only good at current meter for current customer). Some will obviously persist, but it is such a small amount that it has to be rather insignificant to IP, but may be pivotal to some who invested in PV under current rules. So if it were me making this decision, I would simply ask myself what is right, given the situation that gave rise to the issue.

However, to the larger issue – this Agreement. I think, for the reasons above, I would just decline and say “try again”.

Unique Identifier: 164.165.206.42

Diane Holt

From: david@ecboise.com
Sent: Saturday, November 9, 2019 3:59 PM
To: Diane Holt
Subject: Case Comment Form: David Wise

Name: David Wise
Case Number: IPC-E-18-15
Email: david@ecboise.com
Telephone:
Address:
Boise Idaho, 83709

Name of Utility Company: Idaho Power

Comment: I am a home owner living in Boise City. I have been a resident here for over 32 years. I have no ownership in any Solar Panel manufacturing or installation company, so I am speaking as a concerned Citizen regarding IPC-E-18-15.

I have been investigating the purchase of solar panels for my home for over 6 years now, and finally this year decided to purchase and have installed solar panels on our home. This decision was not taken lightly, as the cost was substantial. Initially, our cost is \$49,000 to purchase and install the panels on our home. Next year we'll receive our Federal Credit and State Credit totaling \$17,000, lowering the total investment cost to \$32,000. This is a substantial investment taken on by one homeowner.

We decided to move forward with this investment BASED ON current rate structures for net metering for Customer Generation using rooftop solar. We were concerned about the return on our investment, and how quickly we could pay off the loan for the panels based on savings from not having a power bill. We spent months calculating every kWh from past usage over the past 8 years to help us make this decision. If I would have known that those rates would be changing substantially, I probably would not have purchased the system, and its that that scares me.

Cities and States all across the country are attempting to move toward more efficient ways to create the energy we need. Businesses are building buildings that are LEED certified so they need less and less outside power and water. Citizens all across the country WANT to participate in that endeavor. We want to do our part in helping to use cleaner energy so that we aren't causing the net negative effect to our climate as we are now. Solar power gives us that ability to be part of that endeavor. In creating more electricity from the Sun than our household uses in a year, we are doing just that! And in the future, I have plans on purchasing an electric car that would be powered by my panels, thus negating all the pollution my current vehicle creates and emits into our valley. These are all things our Governments have been encouraging us to do. You've encouraged us to be more energy efficient. And now that we have, Idaho Power wants to penalize us for doing the very thing that helps our community, our State, and our World.

The excess power our panels generate during the day go right into the homes of my neighbors next door. The cost of this transfer of power from my panels to my neighbors homes is minuscule due to the short distance the power has to travel. Idaho Power's proposal wants to give me 4.4 cents per kWh and then sell that SAME power to my neighbor at 8.5, 10.2, or 12.2 cents per kWh depending on what tier they are on. That power that Idaho Power paid NOTHING to generate and costs them little to nothing to transfer, profits them from 4.1 to 7.8 cents per kWh in pure profit. We spend all the money to purchase, install, and maintain our panels, and Idaho Power is proposing to grab more and more profit from them. This is disingenuous at best, thievery at its worst. Idaho Power claims on its website its goal of "100% clean energy by 2045", "Join us on this journey. Learn how you can make a personal impact by making energy efficient choices", and "See how clean energy helps attract businesses and grow our economy", and yet is GREATLY disincentivizing Idaho citizens from participating in that very goal.

It is obvious to this Boise City resident that the goals of Idaho Power and the goals of the Idaho PUC are beginning to move in different directions. Idaho Power is a company with shareholders, and therefore its focus is the continuance of that company for its employees and shareholders. As with any company, along with service to its customers, profit and the continuance of the Company is its goal. Idaho Power sees its future, and its not good. With technology continuing its march, and prices for this technology continue to drop making it more affordable for everyone, Solar Power could eventually mean a very different Idaho Power in the future. With company's pouring millions or billions into R&D into battery technology, Idaho Power sees its services becoming less and less necessary. If every home and business had solar panels, and with the future of battery technology moving faster and faster to store that power on site, the need for additional power beyond what the average home can produce here in Idaho means at some point an outside power source may not be needed. Idaho Power knows this, and is merely attempting slow that march.

On the other hand, the Idaho PUC is the People's voice. Appointed by our Governor and confirmed by our Senate, the Idaho PUC is there to stand as a bulwark protecting the Citizens of Idaho. The Idaho PUC is FOR the People, whereas a private company is FOR its own interests. And its quite clear to me that these goals are beginning to diverge.

The People of Idaho need the Commissioners of the Idaho PUC to stand firm for the People of Idaho. We want a clean responsible way to create our own electricity that is financially viable for everyone. Idaho Power's proposal will cripple a growing business segment in Idaho, the solar panel industry, and make it difficult if not impossible for those considering the large investment in solar power anytime in the near future. A financial win for Idaho Power, but a substantial loss for the Citizens of Idaho and our Environment.

I would respectfully request that the Commission unanimously reject Idaho Power's proposal.

Thank you for your attention.

David L. Wise
Boise, Idaho 83709

Unique Identifier: 164.165.206.42

Diane Holt

From: crowcasa@msn.com
Sent: Saturday, November 9, 2019 1:48 AM
To: Diane Holt
Subject: Case Comment Form: Jimmy Crow

Name: Jimmy Crow
Case Number: IPC-E-18-15
Email: crowcasa@msn.com
Telephone: 2086020006
Address: 4268 W Kelsey Creek St
Eagle ID, 83616

Name of Utility Company: Idaho Power Company

Comment: We had solar panels installed on our roof about two years ago. The system design was heavily influenced by the existing net zero pricing in effect at the time. The design generating capacity was based on usage during previous years, and intended to be approximately net zero year by year; we had no intention to generate and sell excess power. We did not install batteries with our system to capture and store excess power during peak generation periods since they were unnecessary based on the existing net zero policy employed by Idaho Power. We were motivated to install solar panels based mostly on economics and secondly a desire to contribute toward reducing dependence on fossil fuels for electrical generation.

As I understand the proposed change in billing, Idaho Power intends to change the billing measurement interval from a net monthly to a net hourly basis, and to "buy" excess generation at a price that they estimate to drop to 4.4 cents/kWh by 2028. Roughly speaking, 4.4 cents/kWh is about 50% of today's selling price to residential users.

If we had known of Idaho Power's intent to make such a change in billing measurement methods (net hourly vs. net monthly) and cost structure when we were evaluating whether or not to install solar panels, we most likely would have decided not to install them. We are retired and live on a fixed income, and having the opportunity to have some predictable control on elements that contribute to increases in our cost of living was attractive. The changes proposed by Idaho Power will mess things up for us.

Over the ten year period from 2008 to 2018 Idaho Power rates for the first 2000 kWh have risen by about 50% during non-summer periods, and by about 40% during summer periods. These numbers are based on what our subdivision pays for street lighting. I don't have all the historical records for our home, but assume the percent rate increase would have been about the same for residential users. If Idaho Power increases residential rates at the same pace going forward, by rough estimate in 2028 we will be buying power at about 12-13 cents/kWh. Using their numbers (4.4 cents/kWh) they will be buying our excess generation at roughly 1/3 the amount they will be selling it back to us.

If approval to bill on a net hourly basis is given, we will have no choice but to sell a large portion of the power generated from our system to Idaho Power the moment it is generated. For example, During the May/June billing cycle of this year our solar panels generated power at an average rate of 31.9 kWh/day vs. consumption rate of 16.0 kWh/day. Broken down by hour, power is produced at an average rate of ~1.3 kWh/hour, and consumed at ~0.7kWh/hour.

While our home consumes power fairly continuously but unevenly throughout the whole day, on a typical sunny Idaho day the solar panels produce following a bell curve profile between around 8 AM to 8 PM, the most productive period being between around 10 AM to 5 PM. During peak generation periods, in just a bit over 3 hours the panels are able to produce the 16.0 kWh our home consumes on an average day. Due to the differences in the profiles of generation and

consumption we will be selling at bargain rates much more than 50% of the power produced daily (under net monthly billing) by the solar panels on our roof.

As stated previously, If we had known that Idaho Power was going to propose such a radical change in billing, we would probably not have installed a solar panel system at all. I have no knowledge of how the proposed cost system will affect the decision of others to install solar systems on their homes, but suspect that it will discourage rather than encourage people to do so unless costs drop somewhere else.

In our case, however, the proposed changes to the billing methods erase a large part of the cost benefit that existed when we decided to install a solar panel system, and transfers those cost benefits to Idaho Power, at no risk or increased cost to them. To us this looks very much like unfair bait and switch tactics.

We request that if the proposed changes are adopted for new as yet unbuilt systems, grandfather provisions should be made for those with already installed systems, to continue on current net zero billing methods.

Regards,
Jimmy and Colleen Crow

Unique Identifier: 164.165.206.42

Diane Holt

From: Jon Goranson <jon@dcengineering.net>
Sent: Tuesday, November 12, 2019 9:22 AM
To: Diane Holt
Subject: PUC Comment - Case Number IPC-E-18-15

Case Number IPC-E-18-15

Description: IDAHO POWER--APPLICATION TO STUDY NET EXCESS ENERGY FROM CUSTOMER ON-SITE GENERATION

General Comment

The intent of this comment is at a minimum to provide a basis for grandfathering in existing customers on the Schedule 6 rate who have made financial decisions based upon the published, current, Schedule 6 rate structure.

We are a rural residential customer of Idaho Power. Our residence does not have access to a gas utility and is 100% electric. Our usage patterns are heavy in the winter (heating) and very low the rest of the year. In order to offset some early winter bills that approached \$900 in a month, we have worked at all sorts of energy efficiency strategies, including installing water source heat pumps, added insulation, radiant barriers, keeping our thermostat low (58 degrees, on average) and supplementing with a wood stove. The decision to put in a solar system this past year was based on the opportunity to help support (give back to) the utility system 9 months out of the year, and in return, be able to take advantage of that surplus power in the winter months. The hope was to be able to raise our thermostat up to something more reasonable.

Changing the energy measurement to a net hourly basis and modifying the credit rate has a huge impact to the return on investment estimated for our solar system. In effect, it makes the system not viable at all. Rather than a 12-13 year payback, it would take approximately 32+ years for a return on investment (which exceeds the life span of the solar system). **With the new rate structure, new solar systems at residences will be cost prohibitive and will not be installed for any sound financial business reason at this time. This contradicts the position of environmental sustainability that Idaho Power portrays and is of global importance.**

One Real World Example:

The example charts, following, show my current month energy usage (Sept 27-Nov 1). To highlight what affect the "hourly" measurements have, let's look at three specific days. One that is pretty even for usage and generation (Oct 27), one that is net negative (more generation than usage; Oct 10) and one that is net positive (one in which more power is used than generated; Oct 28).

On the one day that was even in usage and generation, if energy is measured by the hour and a credit rate of \$0.044 is used, that even day (rather than a bill of \$0) we would be charged \$2.82.

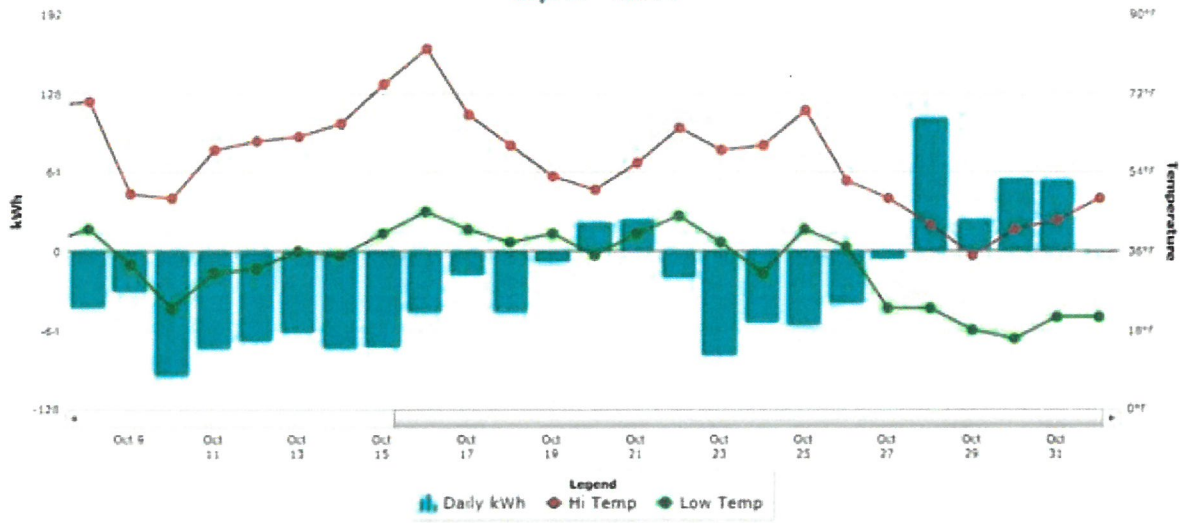
For the net negative day, rather than a credit of \$7.84, we would have a much lower credit of \$3.55.

For the net positive day, we would pay \$8.93 vs. \$8.52.

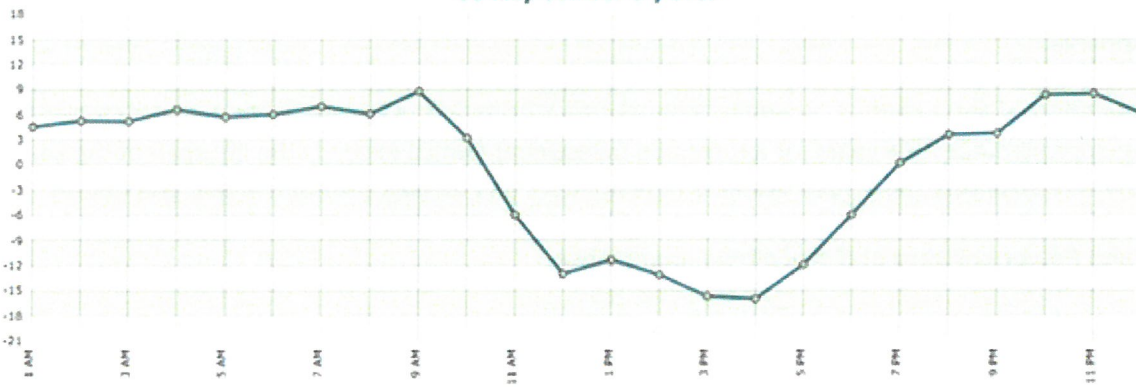
The total of these three days is a charge of \$8.20 for essentially the same overall energy consumed as generated (231kwh and 230kwh respectively).

How does that compare to a monthly measurement? There are 6 days shown with net energy delivered to the home. The total consumed for those three days is 300.8kWh. There are 24 days shown with excess energy generated and put back on the system, totaling 986.9kWh. With the current schedule 6 rates, we would receive a credit of \$102.20 for this fall month. The proposed hourly measurement and adjusted credit rate of \$0.044 results instead, in a total credit for the monthly of \$6.01. Mind you, this **\$100 difference in one month** is in a fall month where we have produced over 3 times the amount of power as we have needed. It is anticipated that in Nov-Feb, the new rate structure would result in costs of \$200-\$350 per month (vs a neutral amount; that is net zero, over the course of a year).

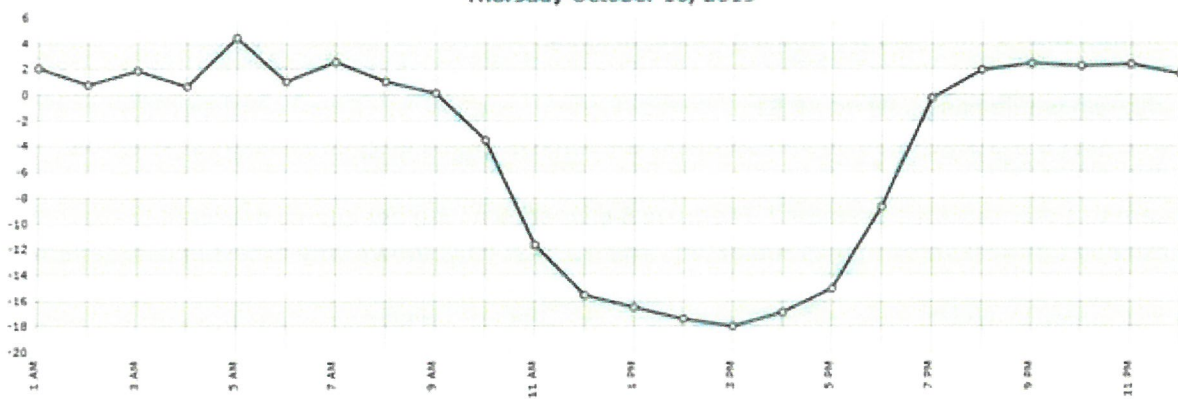
**Daily Energy Use & Temperature
Sep. 27 - Nov. 1**



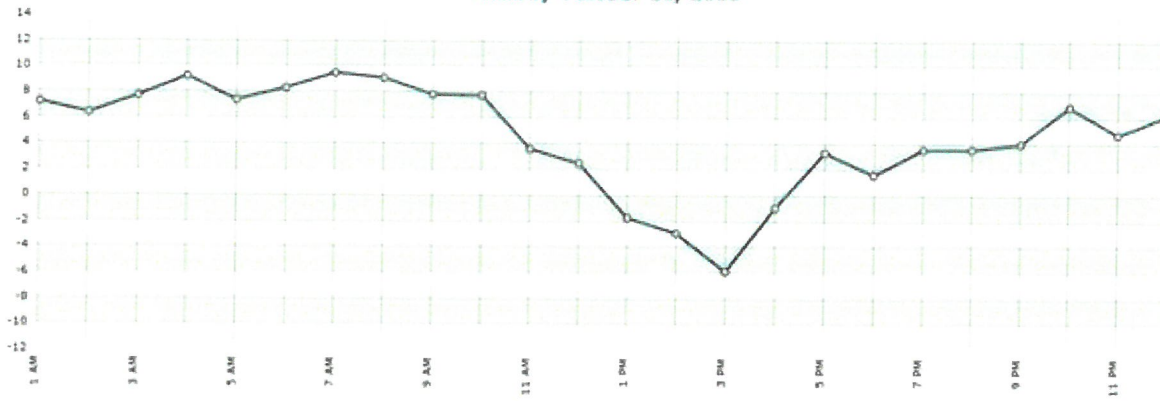
**Hourly kWh
Sunday October 27, 2019**



**Hourly kWh
Thursday October 10, 2019**



Hourly kWh
Monday October 28, 2019



In Closing:

Grandfathering in existing customers who have already made energy commitments seems, at a minimum, the fair approach. Another consideration would be to increase the fixed initial cost of serving Rate 6 customers to something that fairly represented the true cost of “connection” and to leave the energy rates as they are.

Thank you for the opportunity to provide comment.

Jon Goranson, PE (ID)
Electrical Engineer

Jon and Krista Goranson
Home Owners and Rate Payers

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