

November 13, 2019

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

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2019 NOV 15 AM 10:00

IDAHO PUBLIC
UTILITIES COMMISSION

Docket IPC-E-18-15

To Whom It May Concern:

We just finished building our new home in Hailey, ID in March, 2019. During our design process, we made the decision to put solar panels on the roof. This decision was not made without serious consideration given the initial cost output of the panels and the labor to install them. At the time, we also worked carefully with Altenergy to figure out how much energy we would use in a year, seeking primarily to come up with a formula that would meet all of our electrical needs. Then two weeks ago, with no previous notice and without any input from us as a customer, we received a letter from Idaho Power stating that a “settlement” had been reached that would have a serious impact on all residential solar customers.

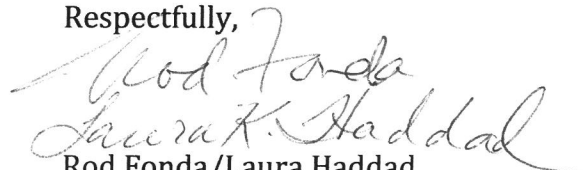
During our house design and construction process, we analyzed our power needs based on the current policy utilized by Idaho Power. Our intent was to reach the proper balance of power produced by our solar panels vs. the power we would consume. Those calculations were based on an annual basis; we certainly had no idea that a calculation by the hour would be necessary. Instead, the proposed settlement would change two important components to the system we had contemplated and under which we have been operating: (1) instead of calculating power based on the annual amount consumed vs. annual amount produced, the power would be calculated on an hourly basis; and (2) for every hour that we produced less than we consumed, the gap would increase between the amount Idaho Power would charge us for a kilowatt compared to the amount it would credit us when our system was overproducing.

Idaho Power professes to be moving toward “clean” energy. At present, the primary component of their movement appears to be hydroelectric power. Obviously we all agree that hydroelectric power is “cleaner” than fossil fuels—but hydroelectric power includes many more serious environmental impacts than does solar. At a time when the diminishing returns of one of Idaho’s most treasured resources, its salmon, seems to be reaching a critical point, it seems ironic that the dams that threaten the salmon are the lynchpin of Idaho Power’s future plans. We believe Idaho Power should be doing what it can to support solar energy to the maximum extent possible, not try to institute a plan that penalizes those like us who made the significant financial commitment to utilize solar, and one that will be a serious impediment to customers who will be considering whether solar power should be in their future. We think Idaho Power should be supportive of each and every attempt

by customers to increase reliance on a clean and renewable source of energy that does not have ANY negative impact on our environment!

At the very least, we believe it is only fair that Idaho Power maintain its pre-existing framework for customers who designed their solar power systems based on current policy and who relied financially on those policies in designing and purchasing their homes.

Respectfully,

Handwritten signatures of Rod Fonda and Laura K. Haddad in cursive script.

Rod Fonda/Laura Haddad

P.O. Box 3649

Hailey, ID 83333

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2019 NOV 15 AM 9:58

6568 S. Federal Way - 121
Boise, Idaho 83716
November 11, 2019

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

RE: IPC-E-18-15 IDAHO POWER--APPLICATION TO STUDY NET EXCESS ENERGY FROM CUSTOMER ON-SITE GENERATION

Dear Idaho Public Utilities Commission,

I'm writing to you to express my disagreement with the proposed settlement in IPC-E-18-15. It is my hope that after seeing the negative impact this will have you will decide against it.

My family invested a significant amount of money in our 20 kW net metering project less than two years ago. I know that we would not have invested in a 25 year project had we known that Idaho Power would simply be able to propose that net metering would be taken away. Even with the federal tax incentives that risk alone would have changed our decision.

My family invested in a solar net metering project (and the government has too through its incentives) due to the large amount of money we spend to heat our home with electricity. We don't have the option of natural gas and propane pricing is to volatile. We spent over 3000 \$ per year before our system was installed. It was our highest expense other than food. In another ten years I would expect this to double to 6000 \$ per year since it has doubled since I moved to my home in 2002 - the cycles always grow shorter. With no net metering we will be forced to heat with wood - our only other option. If Idaho Power wins this case we might be able to dismantle our solar system and sell the components to try and recover some of the cost but the losses will be high. Hopefully this illustrates why this is such an important long term investment for us and why this case should not be decided in Idaho Power's favor.

Idaho Power's arguments need further analytical and scientific examination. When I look at them I can't see the evidence backing up their claims. Third party analysis would be very beneficial. Some simple thought experiments prove this out. I would like to point to this article <https://www.brookings.edu/research/rooftop-solar-net-metering-is-a-net-benefit/> written by the Brookings Institution that shows a different view of net metering.

A short thought experiment that, I think, should raise questions about the merit of this case:

When we generate power locally we feed power back to our neighborhood. That power travels only a short distance and doesn't incur the losses that Idaho Power does when it supplies power to our house from hundreds or thousands of miles away. Idaho Power gets the power I produce for free. They then sell it to my neighbors for 10.1 cents per kilowatt (average of what my family pays in the year). But the losses are very low compared to what Idaho Power incurs bringing power from far away. For example in my 20 kW ground solar system I have to move the power from my array about 680 feet and this happens through 2 miles of wire. At peak output I lose 500 watts of energy to heat having the power travel that short distance. Imagine what Idaho Power loses in hundreds or even thousands of miles of transmission lines. Idaho power makes profit at 10.1 cents per kilowatt or they wouldn't sell at that rate. So, say one cent of that is profit - a 10% profit is pretty good. That means 9.1 cents is being spent

on buying the power and delivering it. Lets say Idaho Power pays about 3 cents for the power per kW. That means delivering the power costs 6.1 cents. Infrastructure might be 2 cents of that amount. Infrastructure is fixed and depreciated (I haven't seen any work done to a line in my neighborhood in the 18 years I've lived here). So, 4.1 cents of that amount is lost to heat in carrying the power for all those miles and lost in transformation to various voltages in substations. When I feed power to the grid Idaho Power gets 10.1 cents for each kW I provide plus 4.1 cents more of profit since they don't have transmission losses. 14.2 cents per kW! This small thought problem raises some questions. But overall it tells me locally produced power is better for our communities. That extra 4.1 cents per kW can be used to lower the cost to everyone. Right now there are only about 4000 of us net meter generators but imagine if half of Idaho Power's customers had net metering. The savings to all of Idaho's citizens would be enormous

Thank you for considering my family's opinion in your decision process.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Taylor".

Paul Taylor
(208) 891-1484

JACKSON C. GOSS
1825 W Lemhi St, Boise ID 83705
jgoss159@gmail.com, (208)616-2546

RECEIVED

2019 NOV 15 AM 9:59

IDAHO PUBLIC
UTILITIES COMMISSION

Subject: Support SOLAR on our "Idahomes"

To:
Idaho Public Utilities Commission
P O Box 83720
Boise, Idaho 83720-0074

To Whom it May Concern:

I am writing in regards to Idaho Public Utilities Commission, Solar Energy Docket IPC-E-18-15. I am in support of solar and had 10 panels (3000 watts) installed on my house in Fall 2016 to help defray the cost of conventional electric and to harness a free resource, the sun.

Soon after I switched to partial solar, I was disappointed to learn that Idaho Power was trying to change the rate structure for solar customers. As noted, my system only produces about 25% of my homes actual energy usage, so I still buy the bulk of my power from Idaho Power. Idaho Power proposes an even higher rate for solar usage (regardless of the amount you use) to defray the cost of infrastructure, but I feel that I am being discriminated against. They agreed to a net metering commitment; and now they are trying to change the terms of the agreement against my will.

Maintaining the existing rates and terms for current solar customers is the only fair choice. Approving a net metering policy that encouraged investment for long term savings, only to have it invalidated in this manner, is unethical. I expect more from our appointed officials on the Public Utilities Commission (PUC) and our public utility (Idaho Power). If they had no intention of honoring the service agreement they set out initially, they shouldn't have even made it an option. But they did, and it should be honored.

Sincerely,



Jackson Goss

Brian and Charity Johns
3607 E. 3870 N.
Kimberly ID 83341

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2019 NOV 15 AM 9:59

IDAHO PUBLIC
UTILITIES COMMISSION

November 4, 2019

Idaho Public Utilities Commission
11331 W. Chinden Blvd, Bldg 8, Suite 201-A,
Boise, ID 83714

Re: IPC-E-18-15

To Whom It May Concern:

Our family installed a solar system on our home this year. We had contemplated this for a long time and finally decided to make this significant investment. When we learned recently of the pending settlement with Idaho Power and the IPUC, we were horrified. If approved as proposed, then with the swipe of a pen, our substantial investment will immediately become a giant financial albatross to our family.

The proposed net metering changes seem the most significant; we would obviously prefer to maintain monthly metering. The proposed credit rate changes are also troubling to us.

The main principle, though, is this: We passionately urge you to consider the circumstances of existing solar customers like our family. Even Idaho Power says that solar is an expected 15-18 year payback. If changes are felt to be needed, then why not let existing clients like us have that period of time to recoup our investment? We made this investment under the rules in place at the time. To change the rules on us so abruptly would be patently unjust.

Thank you for your consideration.

Sincerely,

Brian A Johns

Charity Johns

X COMM
X H:DRIV.
X AV

D.H.
11/15/19

Diane Holt

From: nelsbrad@isu.edu
Sent: Friday, November 15, 2019 2:48 PM
To: Diane Holt
Subject: Case Comment Form: Brad Nelson

Name: Brad Nelson
Case Number: Case Number IPC-E-18-15
Email: nelsbrad@isu.edu
Telephone:
Address: 161 S. 15th Ave
Pocatello ID, 83201

Name of Utility Company: Idaho Power

Comment: It is in the public interest to keep the value of credit that solar customers receive as it is currently set. We do not need to reverse course on a policy that will help the local economy and local jobs increase. Solar customers are helping Idaho Power to more quickly reach their solar goals, lowering these prices would stop progress towards those goals. It will be harder for our local residents to improve their lots with a lowering of prices.

Brad Nelson

Unique Identifier: 164.165.206.42

Diane Holt

From: edntucker@gmail.com
Sent: Friday, November 15, 2019 1:42 PM
To: Diane Holt
Subject: Case Comment Form: Ed Wardwell

Name: Ed Wardwell
Case Number: IPC-E-18-15
Email: edntucker@gmail.com
Telephone: 208 229 8778
Address: 13268 Dechambeau Way
Boise Idaho, 83714

Name of Utility Company: Idaho Power

Comment: The 2018 Idaho Power Annual Report stated, "Last year marked IDACORP's eleventh consecutive year of earnings growth. Net income increased \$14 million from 2017"

Does Idaho Power need financial help from less than 1% of its client base of when the report stated:

Net Income up 6.77%

Earnings per share up 6.65%

Dividends per share up 7.14%

Average Return on Equity has not dipped below 9% in the past 5 years.

Book Value has increased from \$38.85 in 2014 to \$47.04 that is a 21% increase. As a shareholder I am pleased with that.

As a net metering Idaho Power customers who in good faith invested our own money in I will not stand for a violation of an implicit agreement to keep what I paid for. The current Idaho Power website on their FAQ page and shows a 17 year payback payout expectations which uses the current rate of approximately 8 cents /kWh. Idaho Power's corporate plan to monopolize customer driven power will cut our investment by 49%. It will also effectively crush the current Idaho solar industry we enjoy today and end our efforts to curb climate change by making it prohibitively expensive.

Currently there are 558,000 Idaho Power retail customers and only 4800 or .9% are net metering clients. While there are 5500 pending applicants that will not materialized because the 17-year breakeven payback will be doubled. That is the apparent goal of these changes. However even if all 5500 net metering permits were added it would still only be 1.7% of the client total.

The annual report section on risks stated that promoting energy efficiencies including net metering have mechanisms such as the Fixed Costs Adjustment to address them. It also lists climate change and significantly increased market prices during the summer peak as risks. Given these risks can be solved by distributive rooftop power and Idaho Power's stated goal of 100% clean energy and positive past and projected returns for stockholders, there's no good reason for increased rates for new or existing clients.

Climate change catastrophes are already with us and will get worse for our children and generations to come. Since Washington politicians have reversed progress, we have to do everything in Idaho to stop it and keeping the incentives for distributive power like net metering at full retail pricing is a key element.

On behalf of my wife, my kids, grandkids and great grandkids I urge you to reject any and all reductions for customer compensation. As a shareholder I am ashamed of Idaho Power's hypocrisy about clean energy and its attempt to profit greedily at our expense. Please deny all of Idaho Power's requests.

Diane Holt

From: ryankenn@isu.edu
Sent: Friday, November 15, 2019 10:21 AM
To: Diane Holt
Subject: Case Comment Form: Kenneth Ryan

Name: Kenneth Ryan
Case Number: IPC-E-18-15
Email: ryankenn@isu.edu
Telephone: 2082333130
Address: 242 S 7th
Pocatello ID, 83201

Name of Utility Company: Idaho Power

Comment: I support solar energy and a clean healthy future for energy production. Therefore I am opposed to a reduction in the re-imbusement rates for privately generated solar electricity. Please help move us towards more sustainable energy production by not reducing these rates. Please think of the future of our children and planet when considering this.

Unique Identifier: 164.165.206.42

Diane Holt

From: psewall@sewall.net
Sent: Friday, November 15, 2019 10:27 AM
To: Diane Holt
Subject: Case Comment Form: PATRICK SEWALL

Name: PATRICK SEWALL
Case Number: IPC-E-18-15
Email: psewall@sewall.net
Telephone: 2082833219
Address: 2410 N Hillway Dr
boise ID, 83702

Name of Utility Company: idaho power

Comment: I would like to make the following points:

- 1) The PUC should uphold the original program that was agreed upon by Idaho Power and solar customers. Idahoans, like myself, have invested in local clean energy expecting a fair deal in return.
- 2) Idaho families and small businesses, like me, shouldn't have the rules changed on them after we have already made a significant investment in solar. This just isn't fair.
- 3) The new proposal will cost existing solar customers, like me, significant amounts on their electricity bills.
- 4) The PUC promised that **discriminatory rates** would not be the outcome. I believe if the changes are implemented that negatively impact existing customers' solar investments, it would be **discriminatory**.
- 5) Idaho families and businesses, like me, should not be **penalized** for investing their own money into a program that was created to incentivize purchasing renewable generation. Approving a net metering policy that encouraged investment for long term savings, only to have it **invalidated** in this manner, seems unethical and wrong. If there wasn't the intention of honoring the service agreement set out initially, it shouldn't have been made it an option. But it was, and it should be **honored**.

Pat Sewall

Unique Identifier: 164.165.206.42

Diane Holt

From: bwaters121314@gmail.com
Sent: Friday, November 15, 2019 9:29 AM
To: Diane Holt
Subject: Case Comment Form: Brad Waters

Name: Brad Waters
Case Number: IPC-E-19-5 & IPC-E-18-16
Email: bwaters121314@gmail.com
Telephone:
Address:
Kuna Idaho, 83634

Name of Utility Company: Idaho power

Comment: I wasn't able to find the Idaho Power studies ordered by the PUC on Net Solar costs. I repeatedly searched for the three studies VODER , 2017 ROO and COS. It would have been appropriate that current Net Metering residential customers who are by far most affected and have already spent money been able to see the studies. What I could see was arguments made to PUC.

Idaho power again and again states to be fair to customers. Net Solar must pay more for their electrical service. So let's talk about fair. Idaho power residential customers have been paying for Conservation or Energy efficiency programs for about 15 years at average cost of \$38 a year to pay for upgrading businesses electric system for better efficiency. Idaho power said this is justified because new growth would require distribution upgrades and that all customers would have to pay for the new growth not just new customers. So how fair is that. Talk about fair the vacation home that sits vacant 90% of the time using so little energy you couldn't justify a service connection. Is that fair to the rest of Idaho Power customers. Three arguments made the case that irrigators are the root cause for Idaho Power need to change on site generation policy, How fair is it that Residential customer get more of the impact. Idaho Power had a program that would save customers money above the energy savings if they shut down A/C use in afternoon. The reason was to reduce the load in the afternoon. Now Idaho power is going to penalize Net Solar residential customers for reducing their afternoon load in the same neighborhoods that Idaho power was giving my money away for load reduction.

Final thought for all Net Metering schedule 8 Residential customers, that have already spent their money on systems. Come January when they see the new billing and realize that the \$20,000 system will soon only save about \$20 a month. They aren't going to be happy.

Unique Identifier: 164.165.206.42

Diane Holt

From: cthomp@q.com
Sent: Friday, November 15, 2019 9:24 AM
To: Diane Holt
Subject: Case Comment Form: Pam Reschke

Name: Pam Reschke
Case Number:
Email: cthomp@q.com
Telephone: 208 233 0429
Address: 1999 Barton Road
Pocatello ID, 83204

Name of Utility Company: Idaho Power
Comment: Dear Members of the Idaho Public Utilities Commission,

I urge you to deny the Rate Change Proposal submitted by Idaho Power on net metering.

This summer I invested in a home rooftop solar system based on the current policies of net metering. It does not seem right or fair for Idaho Power to change the rules just after I, and many others, have made such a large investment; an investment that is to the benefit of the public interest. The more "green" power, the better it is for everyone.

If the Idaho Public Utilities Commission approves the recent proposal on net metering, the value of credit that I and other solar customers receive for excess electricity sent back into the grid would decrease over time to a value about 50% lower than it is today. This in turn will make all of our solar systems much more costly as our electrical bills increase.

When I made the investment in local clean energy, I expected a fair deal from Idaho Power. I expected that that Idaho Power had the integrity to keep up the policies on net metering that were part of the original arrangement for dealing with the excess electricity.

Please ensure that net metering policies honor and promote investments in solar, It is important globally that the use of clean energy increases in Idaho.

Sincerely,
Pam Reschke
1999 Barton Road
Pocatello ID 83204
208 233 0429

Proud to be Part of Solarize Pocatello

Unique Identifier: 164.165.206.42

Diane Holt

From: patfeuerborn@gmail.com
Sent: Thursday, November 14, 2019 8:51 PM
To: Diane Holt
Subject: Case Comment Form: Pat Feuerborn

Name: Pat Feuerborn
Case Number: IPC-E-18-15
Email: patfeuerborn@gmail.com
Telephone: 208-233-8969
Address: 415 Randolph
Pocatello ID, 83201

Name of Utility Company: Idaho Power

Comment: I was very surprised to receive a letter from Idaho Power regarding proposed changes to the compensation structure for our recently installed solar panel system. These changes to the net-metering process and the credit reimbursement propose to raise our costs drastically and break faith with the understanding we had with Idaho Power when we installed the system this summer.

Idaho Power has spent a lot of time and money encouraging customers to conserve and save energy, providing LED light bulbs and other incentives. It has publicized its "Clean Today. Cleaner Tomorrow." initiative and the goal to provide 100% clean energy by 2045. Our solar system helps Idaho Power with this goal.

I've long been interested in solar power and its benefits for our planet but the costs have been prohibitive in the past and beyond my means. With advances in technology, the net-metering rate structure Idaho Power has been offering, and the support of Solarize Pocatello, it finally seemed within our reach.

Not everyone may agree that it was a financially wise decision for my husband and me. As 70-year-old retirees, we may not be able to remain in our home enough years to actually recoup our \$15,000 investment. But we made this choice because we felt it was the right thing to do - for the environment, our community, and the future of our planet. Idaho Power does not pay us for any extra energy we generate beyond our needs as in some states, but we receive a one-to-one credit for extra kWh to be drawn as needed.

I do not mind generating more than we use, even if we never need the full amount back. Any extra energy we can generate is a donation to Idaho Power to help keep costs lower for all customers. In fact, wouldn't it benefit all of us if every possible building were generating solar energy to pool for use by all as needed?

Please recognize the value of customers using and contributing solar energy and DO NOT change the rules on us now.

Unique Identifier: 164.165.206.42

Diane Holt

From: marench@gmail.com
Sent: Thursday, November 14, 2019 9:43 PM
To: Diane Holt
Subject: Case Comment Form: Maren Hansen

Name: Maren Hansen
Case Number: IPC-E-18-15
Email: marench@gmail.com
Telephone: 208-515-8408
Address: 4916 N. Maidstone Pl
Boise Idaho, 83713

Name of Utility Company: Idaho Power

Comment: My family made the capital investment in 2019 to install a solar system on our residence. We made this decision for several reasons, some green, some accountability, and some financial. Financially, our decision was made based on the existing net metering program. For Idaho Power to change the metering rules on existing solar generators is unfair and unsupportive.

This proposed change will degrade the trust in the PUC, discourage future solar energy generators, and makes Idaho Power look like they aren't committed to clean energy.

Customers who choose to install solar systems do so knowing the huge upfront costs and that we are on our own if our systems need repaired or replacing. Our solar systems, that we are totally responsible for, benefit utility companies too, by generating energy that help meet higher demand in peak times. We provide the energy with our systems we paid for, that Idaho Power can turn around and sell for more than our current buy back rate - and Idaho Power wants to lower our buy back rate? No, we do not support this proposal.

We made a private investment for public good - this way of thinking should be rewarded, supported, incentivized - we want more Idahoans going green to preserve our home for our children, set an example.

Unique Identifier: 164.165.206.42