

## Diane Holt

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**From:** kwhite511@msn.com  
**Sent:** Tuesday, November 19, 2019 11:42 AM  
**To:** Diane Holt  
**Subject:** Case Comment Form: Kenneth White

Name: Kenneth White  
Case Number: IPC-E-18-15  
Email: kwhite511@msn.com  
Telephone: 540-422-6087  
Address: 5010 Joe Lane  
Nampa Idaho, 83687

Name of Utility Company: Idaho Power Company  
Comment: Responding to IPC-E-18-15

This is in response to the Idaho Power notification letter dated October 23, 2019 which stated the proposed changes to their net metering policy.

We bought our place in Nampa Idaho January 2016, after looking for more than a year at various areas in over 7 states as I was finally retiring at age 72. We really like Idaho, the beauty of its outdoors, and the independence of its peoples.

I became aware gradually of the prominence of the Idaho Power Company as the bills we received were becoming more and more fervent, highlighting our large consumption of electrical power. The only thing I knew then about electric companies was the monthly bill: this Company is different. It turns out our bills were nearly twice as much as the average consumer's electricity for the size of our little house (1750 square feet). In each monthly electric bill, there were flyers indicating ways in which we could lower our electrical consumption such as insulating our windows and doors. Trying to be conscientious and a good citizen, I felt compelled to fix or replace many items in our 1976-built house which had had little or no maintenance in years.

I started with the old HVAC system which I knew needed to be replaced. I contacted a local heating company from Meridian to work on the HVAC system. The heating company recommended going to natural gas since I already had a gas fireplace (easy install). I felt the eyes of the electric company, so I didn't skimp on selecting the product set the HVAC company installed. I bought the highest seer rating system they had and thus went from electric heating to gas heating. Enter Intermountain Gas Company to our life, that being using natural gas as the main source of heating is new for us. The new HVAC system cut my electricity consumption by nearly one half. The miniscule bills we now receive from Idaho Power no longer have slicks in them depicting insulation suggestions and are deafening in their brevity. The bills we now receive from Intermountain Gas Company are gleeful and friendly and have candy kisses in them. The point here is that we have the right to choose whomever or whatever we want as our source of energy without penalty.

About the same time, I was installing the HVAC system, a young man representing a solar installation company slipped a flyer in my door. I happened to be outside at the time and spoke with him. Being a Technologist and an early adopter of new technology (curiosity this instance batteries), I was really sold before I spoke with anyone, but I had no direct personal experience or current knowledge of microgrids at that time. To gain insight into solar, I perused Idaho Powers web site where I found much solar information which touted its benefits. These benefits included adding value to my home and property, being buffered from future rate hikes, and the net metering policy which gave me credit for power which I would generate from my solar panels. The verbiage concerning Net Metering in the Customer Energy Contract application added credence to the "being buffered from future rate hikes" idea. Being retired and on a fixed income, the idea of being buffered from rate hikes was especially important in addition to shielding the consequences of any

inflation. The solar installation company reiterated this sentiment stating, "the only direction rates go is up, rates never go down". They wanted my business and so never mentioned anything about the current rate consternation and the ongoing negotiations concerning the changing to the net metering policy. The solar system was improperly installed but made active on December 28, 2018. The solar installation company turned out to have been heavily involved in the net metering conversations all along.

The solar installation company literally handled everything, all paperwork.... everything. Once you signed the contract, they had the money and they were gone. This was their mantra then as it is now. I was to formally receive a copy of all paperwork after the solar installation was done. Amongst all the paperwork was the Idaho Power Net Metering application which I did sign. I did see the check box at the bottom of the application which stated, "I understand that the on-site generation and net metering service – including the rate structure and interconnection requirements – are subject to change and that current rates so not represent future pricing". There was no indication whatsoever that the value of the electricity we generated would be subject to changes that would be beyond the pale. There was no indication in any of the solar promotional literature or web statements that there would be any negative change to the highly touted net metering policy. We assumed that the statement on the Idaho Power Net Metering application concerning "subject to rate hikes" pertained only to any electricity which we had to buy from Idaho Power and not to the electricity which we generated. It never occurred to us that the net metering policy would be altered in such a way that we would have to buy back OUR own power at a discounted rate. It is totally dishonorable to renege on this agreement because we own the electricity we generate, and the Idaho Power Company benefits greatly from using it during peak times. Had I known that Idaho Power would not honor their stated net metering policy, I would not have bought into solar.

From the Idaho Power web site

"Idaho Power is a summer-peaking utility; the company's highest demand in the summer months when irrigation pumps and air-conditioners add to the regular demand for electricity", consequently, Idaho Power Company makes good use of my excess electricity to help offset these Peaker periods.

We will discuss this in my next response.

Unique Identifier: 164.165.206.42

## Diane Holt

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**To:** Diane Holt  
**Subject:** Case Number: IPC-E-18-15

Case Number: IPC-E-18-15

Dave and Ingrid Burica

311 Heikkila Ln.

McCall, ID 83638

(208) 634-6478

[buricad@gmail.com](mailto:buricad@gmail.com)

Utility Company: Idaho Power

Dear Idaho Public Utility Commission,

Thank you for providing the opportunity to comment on the Settlement Agreement Order #34460, regarding Idaho Power Company's Study of the Costs, Benefits and Compensation for Net Excess Energy Supplied by Customer On-Site Generation, Case No. IPC-E-18-15.

As a current residential solar customer, my wife and I plead that the Commission reject the Settlement Agreement as submitted, because it is clearly incomplete.

First, however, we would beg the Commission, at a minimum, to grandfather in current on-site installations and those which are in the process of being installed under the net metering arrangement. It speaks to the credibility of the Commission that they stand by the conditions that were and are in place when these long-term investments were initiated. The many reasons for initiating net metering in the first place in 1983 remain as strong now as they were then. How the commission treats historic net metering customers will affect whether Idahoans will trust the Commission going forward.

Next, after carefully reviewing the IPC-E-18-15 Settlement Agreement, and the companion study submitted in September 2019, IPC-E-18-16, the Motion to Accept the Fixed Cost Report, we feel that the Settlement Agreement is premature and incomplete. The IPC-E-18-15 and IPC-E-18-16 submissions are based solely on the Cost of Service analysis and compensation from the perspective of Idaho Power.

The remit for IPC-E-18-15, however, includes "Benefits." These two submissions clearly omit any accounting whatsoever for benefits both specifically to Idaho Power, and to the "Public."

Demand for electricity is high during the summer and coincides with peak production of solar installations and therefore instant availability to Idaho Power to use. At the same time of day that Idaho Power is incentivizing (paying for) reduced use, excess solar is peaking and reducing the demand on their production facilities. Additionally, Idaho Power is able to resell excess power to out of state markets during these times at higher than local market rates. We were unable to find accounting for these points in Idaho Power's Cost of Service and Settlement submissions and they openly admit they didn't do it.

What's more, in their Settlement, Idaho Power pointedly assigns no environmental benefit for excess solar and declines to attempt it, leaving it for future determinations. This alone is enough to demonstrate that the Settlement is premature.

The Idaho Power coal-fired facilities have definite costs to the public, especially during the winter. At that time of year, coal provides nearly half of production and air quality is already poor due to inversions. The coal-fired facilities result in environmental and health costs in terms of waste heat and emissions. The emissions ultimately result in respiratory ailments and worse, and sufferers and society entail substantial medical costs. Although difficult to account, these costs are real and are mitigated to the extent that solar supplants the need for burning of fossil fuel.

Furthermore, toxins in the Snake river, in part generated by coal fired power plants, are concentrated in the reservoirs behind Idaho Power's dams, and have made the resident fish unsafe to eat.

And of course, the dams themselves, far from not impacting the environment, have decimated and eliminated anadromous fish populations, despite the fact that Idaho Power has spent millions and millions of ratepayer (Public!) dollars to mitigate this. The impact on river communities and Idaho Tribes has been tremendous. They have sustained marked financial harm due to this issue. There needs to be an accounting.

Finally, *security*. Idaho Power's business in Idaho offers little redundancy. There is substantial vulnerability to denial of service attacks due to their structure. Distributed power sourcing, including residential and small on-site with or without storage, makes Idaho less vulnerable to consequences of attack such as widespread power blackouts both intentional and by force of nature.

The Settlement openly states that they do not have the methodology to determine Avoided Energy Value, Avoided Transmission and Distribution Capacity, and Integration Cost as well as Environmental Benefits. Leaving these off of the analysis is a substantial omission rendering the conclusions and proposed rates effectively baseless.

Idaho Power has claimed that there is effectively a transfer of wealth from non-solar to solar customers and that non-solar customers are subsidizing their solar customers. At this time, residential and small commercial on-site production affect only a tiny portion of Idaho Power's business. Many studies, done by PUCs in other states, referenced here: <https://www.brookings.edu/research/rooftop-solar-net-metering-is-a-net-benefit/>, show net benefit for the general, non-solar customer. Furthermore, it is disingenuous for Idaho Power to suggest any such transfer of wealth when they have not proposed an off-setting reduction in rates to non-solar customers in their remedy. *There is no emergency.*

The Commission owes their allegiance to the Idaho Public. Please send the good folks at Idaho Power back to the drawing board. From their openly admitted omissions, it is clear that they either chose not to or did not have the capability to complete their self-imposed remit. The commission should hold them to their original proposal or expect future bait-and-switch submissions. The Settlement should not be accepted.

Idaho is a wonderful place to innovate and be at the forefront of new technological opportunities. Let's continue to incentivize these and move Idaho forward instead of backward. In Vermont there is a model where the power company is purchasing storage batteries for solar customers and tapping their capacity, at a profit! We should continue to incentivize rather than discourage innovation, and diversify our investment in the future, rather than risk all on protecting the outdated technology the of the past century.

We greatly appreciate this opportunity to comment. Thank you again.

Sincerely,

Dave and Ingrid Burica

## Diane Holt

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**From:** mike.o.stratton@gmail.com  
**Sent:** Tuesday, November 19, 2019 10:53 AM  
**To:** Diane Holt  
**Subject:** Case Comment Form: Michael Stratton

Name: Michael Stratton  
Case Number: IPC-E-18-15  
Email: mike.o.stratton@gmail.com  
Telephone: 208-965-9262  
Address: 4451 Sahara Drive  
Nampa ID, 83686

Name of Utility Company: Idaho Power  
Comment: Dear PUC,

My comments in regard to the recent proposal from Idaho Power concerning solar customers are as follows:

- 1) The proposal made by Idaho Power directly contradicts their purported goals of the future. They purport to be seeking further clean energy and moving toward more clean energy for the future. This proposal would likely deter any future solar customers due to the outrageous decrease in energy re-imbusement thereby also decreasing idaho jobs in that realm. Additionally, this kind of decrease (penalty) on existing customers would likely drive those customers to consider further measures to go "OFF" the grid thereby decreasing current solar energy production into the grid.
- 2) Like all other solar customers I have made a significant investment in solar panels. I have a large family with a large household. We installed a 23.5 kwh system for the cost of \$68,500. Like all other solar customers I went into this investment only after careful consideration of my return on investment and we had the installation done in August. It is frustrating to think that after careful consideration on an investment that a proposal such as this can destroy that investment. I personally find it hard to believe that Idaho Power even made this proposal. The levels of re-imbusement are atrocious. This would destroy any reasonable timeline for return on investment if even able to get a full return on investment. This proposal feels like a flat out personal betrayal. I went into this decision with an expectation of 1:1 net metering and now it feels as though I will be the victim of a bait and switch at the hands of Idaho Power.
- 3) I would hope that for the future of solar energy that the proposal be denied flat out but if it were to proceed I would plead that all existing solar customers be grandfathered in to 1:1 net metering. I can't imagine Idaho Power would be against a grandfather clause as my experience thus far has been that Idaho Power works with the community. The proposed change to existing customers would be an action by Idaho Power that alienates itself from the community and forms enemies due to what is perceived greed.

Please approach this decision with us Idaho citizens in mind.

Thank you for your thoughtful consideration,

Michael Stratton  
mike.o.stratton@gmail.com  
208-965-9262

Unique Identifier: 164.165.206.42

## Diane Holt

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**From:** teejaysayles@gmail.com  
**Sent:** Monday, November 18, 2019 10:01 PM  
**To:** Diane Holt  
**Subject:** Case Comment Form: TJ Sayles

Name: TJ Sayles  
Case Number:  
Email: teejaysayles@gmail.com  
Telephone:  
Address: 4809 Morris Hill Rd  
Boise ID, 83706

Name of Utility Company: Idaho Power

Comment: I would like to say for the record, that Idaho Power's shameless proposal to raise rates on solar customers like myself is short-sighted. Even though I net meter, I still have to pay various fees each month to cover their costs. The reality is that this entity represents a dying "business" model that is standing in the way of citizens taking control of their own energy needs, albeit incremental, to try And shape the future of clean energy and the planet. You can't change the terms of a deal after it's done just because you don't like it.

Unique Identifier: 164.165.206.42

## Diane Holt

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**From:** dvdd.mmy@hotmail.com  
**Sent:** Tuesday, November 19, 2019 1:21 PM  
**To:** Diane Holt  
**Subject:** Case Comment Form: David Christie

Name: David Christie  
Case Number: IPC-E-18-15  
Email: dvdd.mmy@hotmail.com  
Telephone:  
Address: PO Box 534  
Eagle ID, 83616

Name of Utility Company: Idaho Power

Comment: I am urging you to keep Net Metering intact for existing On-Site Generating customers. The decision to invest a substantial amount of money in solar did not come lightly and was weighted heavily on the Net Metering Policy of Idaho Power. To change this policy, after the fact and at such a low rate of return, would result in a significant financial burden for myself and all existing customers. If the proposed rate structure was in place at the time of installation, I would not have proceeded.

As important, having a rate structure like the one proposed, will discourage and limit solar and other clean generated alternatives, at a time when we need it the most.

Again, I urge you, along with the Boise City Attorney, The Attorneys for Idaho Clean Energy Association, the Idaho Irrigation Pumpers Association and all the independent solar investors: **KEEP THE CURRENT NET METERING POLICY FOR EXISTING CUSTOMERS.**

I also urge you to reconsider your "settlement" with Idaho Power concerning the Net Hourly Billing. This is detrimental to the state, to the economy and a disincentive to new business and growth. Except for Idaho Power, who would certainly profit from it.

Please join the 38-40 other states that have state wide Net Metering and keep it in place for everyone.

Unique Identifier: 164.165.206.42

## Diane Holt

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**From:** randy\_nilson@hotmail.com  
**Sent:** Tuesday, November 19, 2019 1:31 AM  
**To:** Diane Holt  
**Subject:** Case Comment Form: Randall Nilson

Name: Randall Nilson  
Case Number: IPC-E-18-15  
Email: randy\_nilson@hotmail.com  
Telephone: 208-409-8798  
Address: 2000 S. Peppercorn Pl.  
Boise ID, 83709

Name of Utility Company: Idaho power company

Comment: I received a letter from Idaho power on October 23, 2019 notifying me of a settlement agreement between Idaho Power, Intervenors, and the Idaho Public Utilities Commission. I was given no notice of this settlement agreement or the negotiations preceding the agreement when I contacted Idaho power concerning residential net energy generation in February 2019. I would not have invested in solar energy generation had I known these negotiations were taking place.

I am a disabled retired person on a limited budget set for me by Idaho Medicaid. I had to borrow the money needed to acquire the solar array using a 20 year loan. Solar Wholesale prepared a worksheet that used a 4% increase in the cost of my electricity each year and Idaho Power's net energy metering monthly kilowatt hour billing for its solar generation customers. This was the only way I could afford to purchase and install a solar generation system for my home in March 2019.

I began investigating solar power generation in December 2018 with Solar Wholesale. After negotiating financing to purchase the solar generation system I decided to have the system installed in my home. This was not an easy decision considering the large investment required to purchase a solar array. If the rate credited or paid to residential customers is reduced for excess power generated by their solar system, it would definitely remove any incentives to install a clean energy system in the future. For those who have already invested in clean energy, it would destroy any return on investment. It seems to me that the IPUC needs to protect small electrical generation producers by grandfathering the current system for crediting excess power generation.

Unique Identifier: 164.165.206.42



## Diane Holt

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**From:** Diane Holt  
**Sent:** Tuesday, November 19, 2019 8:37 AM  
**To:** Diane Holt  
**Subject:** Case Number: IPC-E-18-15

Case Number: IPC-E-18-15

Dave and Ingrid Burica

311 Heikkila Ln.

McCall, ID 83638

(208) 634-6478

[buricad@gmail.com](mailto:buricad@gmail.com)

Utility Company: Idaho Power

Dear Idaho Public Utility Commission,

Thank you for providing the opportunity to comment on the Settlement Agreement Order #34460, regarding Idaho Power Company's Study of the Costs, Benefits and Compensation for Net Excess Energy Supplied by Customer On-Site Generation, Case No. IPC-E-18-15.

As a current residential solar customer, my wife and I plead that the Commission reject the Settlement Agreement as submitted, because it is clearly incomplete.

First, however, we would beg the Commission, at a minimum, to grandfather in current on-site installations and those which are in the process of being installed under the net metering arrangement. It speaks to the credibility of the Commission that they stand by the conditions that were and are in place when these long-term investments were initiated. The many reasons for initiating net metering in the first place in 1983 remain as strong now as they were then. How the commission treats historic net metering customers will affect whether Idahoans will trust the Commission going forward.

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