

Diane Holt

From: dvpitman@cableone.net
Sent: Wednesday, November 20, 2019 12:20 PM
To: Diane Holt
Subject: Case Comment Form: Dexter Pitman

Name: Dexter Pitman
Case Number: IPC-E-18-15
Email: dvpitman@cableone.net
Telephone: 2082373527
Address: 13689 N Marble Drive
Pocatello ID, 83202

Name of Utility Company: Idaho Power Company

Comment: I have reviewed the proposed settlement agreement regarding changes to the compensation structure for residential and small general services customers. My layman review included the supporting information provided in the September 2019 Idaho Power Integrated Resource Plan (IRP), the 2012 Idaho Energy Plan (IEP) and my own residential roof top solar energy production data. From those efforts I conclude that the proposed settlement agreement is not in line with policies of the State of Idaho, will arbitrarily dictate future energy policy in conflict with those policies, is inconsistent with the IRP planning direction and is unfair to me and other residential roof top solar provider/consumers without "fixing" any unfairness condition that may or may not exist. Consequently the proposed settlement agreement is not in the public interest nor fair, just and reasonable to me as an IPC electrical customer/producer. Because of these conclusions I believe that the Idaho Public Utilities Commission should not approve the proposed settlement agreement.

Basis of Concern

The crux of my concerns centers on the core of the proposed compensation structure: net hourly measurement and credit rate reduction from 8.68 cents per KWh to 4.4 cents per KWh. The impacts to me are quite startling. The brief table below shows the actual crediting impact to me and energy benefit to IPC on three different sunny, solar producing days during 2019: January 8, July 7 and November 8. These are, respectively, days in the worst solar energy producing season, the best and a transitional (moderate) solar energizing season. The result of hourly measuring and crediting at the reduced rate totally reverses the outcome from a positive credit value situation to a negative situation for me the customer/provider. IPC benefits of my systems surplus power supply into the IPC power grid remains unchanged.

DATE	CUSTOMER CREDIT VALUES	IPC Grid Surplus
Provided KWh	@ 8.68 Cents/KWh	@ 4.406 Cents/KWh
January 8, 2019	(-34.72)	(-66.04)0 (-4.00)
July 7, 2019	53.33 1.64	6.144
November 8, 2019	46.29 (-2.13)	5.322
Net Balance	64.90 (-66.53)	11.466

This is terrible for me and my capital investment in clean energy for my home and will raise the cost of my capital investment through power consumption bills from IPC despite producing a net energy surplus to my needs into the IPC power grid. I loose. IPC and Idaho's energy resource win and at my cost!

Beyond my personal issue, the effect of this across a year will be a disincentive to residential roof top solar installation by residential owners in the Idaho Power Company service area of Idaho and Oregon. Why would anyone invest their own money in an energy system with a negative return to them, but reward IPC with marketable energy and company revenue? No one would. Future residential roof top investors and clean solar energy providers will be unlikely. Roof

top solar energy potential of over 495,000 residential customers at present (IRP p 29) will be eliminated by IPUC approval of the proposed compensation rate structure. Four thousand and thirty one currently invested residential roof top providers (IRP P.29) will be left in the lurch and their sizeable capital investments placed in jeopardy. Therefore, the State of Idaho Energy Policy and customer unfairness concerns I have stated appear valid.

Idaho Energy Policy

The 2012 IEP discusses at length the need of the State of Idaho for a secure, reliable and stable energy system and notes that 70% of the energy consumed in Idaho comes from outside our borders. Discussion draws attention to the progress made in recent years "in integrating in-state renewable energy in our energy networks" and, "Significant findings and recommendations include a continued desire to integrate in-state renewable energy, particularly renewable electric generation." Both the IEP and IRP note that energy consumption will increase through time (550,000 customers in 2018 to 775,000 by 2038 IRP page 1) requiring additional energy resource production to meet that demand (50 MW summer peak-hour load growth per year IRP page 20). Nothing precludes residential roof top solar from that energy resource and in fact policies and actions recommended by the IEP do just the opposite (Electricity Resources Policies 1-4 pages 8 and 9; Actions E-1, E-3, E-6, E-7, E-9, pages 9-10). Others direct against policies that discourage investment in customer-owned generation or those that are barriers and disincentives to investor owned utility conservation actions (Actions E-11, CE-4 pages 10 and 12 respectively) including rate designs (CE-6 page 12). Residential roof top solar by policy has a role to play in the energy resource present and future of Idaho and its people.

IPC Energy Strategy

The preferred portfolio and action plan within the IRP identifies two of 24 modeled options as viewed favorably by IPC. Both contain resource actions "aligning well with Idaho Power's goal of 100 percent clean energy by 2045 (IRP page 111). Both options include additions of solar to the IPC energy resource portfolio, 345 MW for the preferred P14 option and 1,190 MW for option P16. Both include contracting 220 MW additional from two commercial solar fields by 2023 and actions to do so are underway. There is no mention of existing residential roof top solar energy resource within the IPC grid. No additional solar is planned by P14 until 2034. An additional 200 MW are planned before 2028 by P16 and another 750 MW 2029-2038. Residential roof top solar is not mentioned as a possible energy resource for the increased solar production. The energy credit reduction will transition to the low rate in 2028. This may be a coincidence or awareness by IPC that residential roof top solar will be precluded from the future resource portfolio by the proposed settlement agreement pricing plus hourly measuring provisions. Either way preclusion will establish a de facto policy of not including residential roof top solar production as an Idaho Power Service area electric generation resource.

It appears from my layman perspective that IPC prefers purchasing electric energy only from large centralized commercial field suppliers rather than collective individual residential sources. The result of the settlement agreement therefore discriminates against residential solar energy supplier/investors and will preclude a substantial clean energy and in-state energy resource from the IPC service area (de facto policy). This is more confusing given that residential solar investors use their own capital investment to provide power they use, power that IPC does not have to provide, and also surplus power to IPC for their use at no production cost to IPC and for the benefit of "keeping low cost energy available to Idaho customers."

Unfair, Unjust and Unreasonable

Residential roof top solar panel systems are a Capital Cost of the residential customer, "The customer is responsible for all costs associated with the Generation Facility and Interconnection Facilities. The customer is also responsible for all costs associated with any Company additions, modifications, or upgrades to any Company facilities that the Company determines are necessary as a result of the installation of the Generation Facility in order to maintain a safe, reliable electrical system." (Schedule 6 Conditions of Purchase and Sale. Condition 5, Settlement Agreement). My personal solar panel facility is a small system with a 3KW nameplate potential and projected annual energy generation of 108% of my annual pre-facility consumption. The Capital Cost for the generation and interconnection equipment was slightly over \$10,200 and after a federal tax credit of \$3,000 and an Idaho tax credit of \$284 the remaining cost was \$6,886 or \$2.30 per KW. During the first 12 months of generation (mid-July 2018 –Mid-July 2019) 4,650 KWh of electric energy was produced. This provided my annual anticipated energy consumption demand (Great...my first goal) and produced 385 KWh of excess net energy into the IPC grid for export by IPC as they deemed fit (Second Goal...supporting the Clean Energy goals of the State of Idaho and IPC). In addition to my Capital Cost I pay IPC a monthly service charge and energy efficiency services fees and of course any and all energy charges for those periods when my consumption exceeds my

solar energy output and surplus credit has been consumed. With the current Export Credit Rate I anticipate that my annual energy output and Export Rate Credit balance will always cover my own annual consumption and IPC will be able to use Exportable Energy produced by my facility. But my personal data table indicates that will change. My facility will not generate an Export Credit Balance value large enough to cover my annual energy consumption cost even though my facility will provide the KW of my demand plus IPC an Exportable Excess Energy amount. My first personal goal will not be met, only the second one benefitting IPC and Idaho's green energy goal.

My "pay back" of my Capital Cost at the annual energy balance and pre-settlement agreement Export Credit Rate and with monthly "fixed fees" to IPC will be by about 25 years. The solar panels are rated for 25 years, the inverter 20 years. Panel efficiency is predicted to decline at the rate of 0.5% per year. My "pay back" will occur close to the system's longevity. However with the proposed reduced Export Credit Rate I will fall far short of a "pay back" point. My voluntary Capital Cost investment to support my personal Green Energy goals and those shared by Idaho policy will be a personal capital loss of considerable magnitude. Any opportunity to off-set my Capital Cost by appreciated home value will be nil because roof top solar systems will be viewed as a liability not an asset. By contrast a \$6,800 investment in Idaho Corp securities can be expected to yield a 2.6% annual dividend to the investor. Reasonably an investment in the IPC Energy Resource system of that amount should be expected to be valued likewise, not devalued. Unquestionably the devaluation is unfair and unjust to me and 4,030 other existing roof top solar Idaho residents. I fail to see how my personal capital investment and pass through of power produced on my roof top at my cost to other Idaho power customers (my neighbors) is unfair to them or IPC. The impacts to me of the proposed rate compensation structure are unreasonable.

Conclusions Drawn

- The proposed settlement agreement is not in line with policy of the State of Idaho, will arbitrarily dictate future Idaho energy policy that is not in the public interest or fair, just and reasonable.
- The IPUC should work with the Idaho Legislature to merge instate renewable energy goals with incentives promoting residential roof top solar energy facilities. 4,031 residential solar producers of 448,000 residential IPC service area customers have already voluntarily and in good faith invested capital in Idaho's clean energy program. The potential for considerably more participation by others exists. That potential should not be nullified by the proposed changes to the compensation structure for residential and small general services customers.
- With effective State leadership and incentives customer capital cost investment in residential solar could provide a considerable contribution to the MW solar additions identified by the IRP...instate renewable energy goals. Application of Renewable Energy Certificates (REC's) for the residential solar and small business energy resource component should be developed and modified if needed to protect solar installed home owners and their capital investment (value added).
- Fair Energy Export Rates that yield a capital investment pay off within 20 years of facility operation while still contributing to IPC solar MW addition goals should be determined by IPUC and established during the two (current and next) IRP cycles. This will establish fair, reasonable and secure state energy policy needed to ensure residential roof top solar investors, promote in-state clean energy resources and provide IPC with their need for a firm export energy rate structure.
- Creative incentive programs encouraging residential customer capital investment in solar should be looked at by IPUC for consideration by the Idaho Legislature considering residential solar incentive programs in other states successful in recruitment enrollment and personal capital investment. Capitalization on the potential residential roof top solar electricity resource for future energy needs is an important aspect of Idaho energy policy: availability of secure, reliable, stable and low cost energy.

IEP Pages 48-49: "Southwest Idaho's solar potential is very similar to that of the desert southwest, which has the highest solar potential in the United State. This allows Idaho many opportunities for solar power applications, however....Idaho is behind much of the rest of the country in solar installations. A few of the benefits of solar include utilization of an abundant Idaho resource, no greenhouse gas emissions, distributed generation, and potential for an additional manufacturing industry in the state. Though solar is an intermittent resource, its intermittency is consistent, and in general its production potential lives up well with high demand (mid-day). As control systems continue to

improve, there is good likelihood for solar to play an important role. " The settlement agreement's proposed changes to the compensation structure for residential and small general services customers ignores this reality and is bad policy for Idaho's energy resource future and customer fairness (555,000 of we Idahoan's).

Thank you for the opportunity to comment.

Unique Identifier: 164.165.206.42

Diane Holt

From: bonesthomson28@gmail.com
Sent: Wednesday, November 20, 2019 10:03 AM
To: Diane Holt
Subject: Case Comment Form: Craig Thomson

Name: Craig Thomson
Case Number: IPC-E-18-15
Email: bonesthomson28@gmail.com
Telephone: 2082869840
Address: 12490 W New Hope Rd
Star ID, 83669

Name of Utility Company: Idaho Power

Comment: When I evaluated things I could do to conserve energy I was not aware the power company would charge me for being to effective. I did most of their suggestions. I had an energy audit, adjusted insulation, changed out light bulbs, converted to geothermal hot water, installed a more efficient furnace, and installed solar panels. Now I learn that some of the efforts will result in surcharges to improve the power company's bottom line. Quick recovery of my investment is important. The power company should support this to encourage more people to do the same.

Unique Identifier: 164.165.206.42

Diane Holt

From: mlarkinaowski@gmail.com
Sent: Wednesday, November 20, 2019 1:37 PM
To: Diane Holt
Subject: Case Comment Form: Michael Larkin

Name: Michael Larkin
Case Number: IPC-E-18-15
Email: mlarkinaowski@gmail.com
Telephone: 2087058912
Address: 7505 W. Portneuf Rd
Pocatello ID, 83204

Name of Utility Company: Idaho Power

Comment: Comment concerning Idaho Power's proposed change to net-metering.

1. I think the proposed change goes too far and will decrease public interest in solar systems on private homes.
2. I do think Idaho Power needs a fair compensation for providing electricity when solar panels do not meet the homeowners needs, but a 50% reduction by 2028 is too much and too soon. I believe a 25% reduction by 2028 would be more than fair.
3. It is imperative that we dramatically reduce our use of fossil fuels in the next decade. Idaho Power's commitment to convert to renewables by 2045 is too late to keep the climate below a 1.5 degrees Celcius increase.
4. Solar power generated by homeowners all over the state has more value than Idaho Power purchasing solar power from a large commercial solar farm, as they do not need to install additional power lines.
5. Many homeowners financed their solar system based on the expectation that rates would stay the same until their systems were paid off. Existing solar systems should be grandfathered in at the current rate for at least 10 years.
6. Idaho Power is unique compared to most state utilities because of their hydro-power capabilities, which give them the option of instantly increasing their power supply to compensate for times when solar power is decreasing.
7. The installation of solar panels and wind turbines in Idaho is providing thousands of jobs and helping to reduce Idaho's carbon footprint. It is not in the public interest to discourage the expansion of renewable energy.

Unique Identifier: 164.165.206.42

Diane Holt

From: jonyoung.cc@gmail.com
Sent: Wednesday, November 20, 2019 8:19 AM
To: Diane Holt
Subject: Case Comment Form: Jonathan Young

Name: Jonathan Young
Case Number: IPC-E-18-15
Email: jonyoung.cc@gmail.com
Telephone: 2084899050
Address: 10374 W. Riley Ct
BOISE Idaho, 83709

Name of Utility Company: Idaho Power

Comment: Bait and switch! That best describes how I feel about the recent letter we received from Idaho Power detailing an unapproved plan to slash the value of excess power that early solar adopters provide to the power grid by 50% over the next few years.

We had our solar panels installed just this spring with expectation that we'd receive a kilowatt-hour for a kilowatt-hour delivered for years to come. To cut that nearly in half so quickly greatly reduces the value of our investment in the environment, our home, and our personal finances.

The Idaho Public Utilities Commission should continue to give existing solar customers the deal they signed up for. Anything less is a predatory marketing scheme.

Regards,

Jon Young

Unique Identifier: 164.165.206.42

Diane Holt

From: hpalison@msn.com
Sent: Tuesday, November 19, 2019 5:59 PM
To: Diane Holt
Subject: Case Comment Form: Patrick Haas

Name: Patrick Haas
Case Number: IPC-E-18-15
Email: hpalison@msn.com
Telephone: 2086312696
Address: 1510 N. 24th St.
Boise ID, 83702

Name of Utility Company: Idaho Power

Comment: We received notification that Idaho Power has requested a change the the structure of the customer net metering program which would result in a substantial increase in our annual costs. This would be fundamentally unfair to us. We made a substantial investment installing solar equipment based on the net metering plan currently in place. To change it to our disadvantage is just not right. We ask that you reject Idaho Power's proposed changes or that at least existing customers be grandfathered in with the current program.
Thank you for your consideration.

Unique Identifier: 164.165.206.42

Diane Holt

From: larrymoore1224@gmail.com
Sent: Tuesday, November 19, 2019 5:39 PM
To: Diane Holt
Subject: Case Comment Form: Larry Moore

Name: Larry Moore
Case Number: IPC-E-18-15
Email: larrymoore1224@gmail.com
Telephone: 2089411873
Address: 11710 W. Tioga
Boise ID, 83709

Name of Utility Company: Idaho Power

Comment: I was informed by my Solar vendor that Idaho Power has submitted a filing to PUC that would be a negative change to my net metering program that I currently have in place. I don't believe it to be fair to have a government entity to change a program that they originally agreed to and approved; selling a program and then once the customer has bought in to change the rules on them. Please do not approve such request per filing.

Unique Identifier: 164.165.206.42

October 22, 2019

Idaho Public Utilities Commission
Post Office Box 83720
Boise, Idaho, 83720-0074

Re: Case number IPC-E-18-15

Commissioners;

The decision to allow Idaho Power to charge the full rate for usage and to cut the amount for power produced by homeowner solar panels is going to immediately stop the installation of these projects.

The system I put in was designed, assembled, installed, wired by me and I had a payback of over 11 years. Those who buy a commercially provided assembly already have payout much longer and now that the Idaho Power return rate is going to drop, the payback is going to be infinite. There will be no installation of personal solar panels on homes anymore. Unless we go "off Grid", there will be no more installations.

The cost of providing back up power to us by Idaho Power is in the area of \$0.02/Kw and that should be the maximum added cost over what they charge us for the energy. The rest is energy, depreciation, overhead (management) and the big profit. We now pay \$5.15 per month for a connection charge and I agree that there should be some additional charge but not as much as granted by the commission. Why is the connection charge only \$5.15 now if it costs so much more to provide available power to existing customers? Why is this set at this value?

Those of us, who have solar panels, installed them based on today's power rates and to change that is tantamount to breaking a contract. If we are not grandfathered there surely will be lawsuits.

Idaho Powers profits are guaranteed and as a result their stock value is now unreasonably high at well over \$100.00/share. They have no reason for cutting costs or the number of vice presidents. The title of the commission is PUBLIC but do you have us, the public in your best interest? I don't think with this decision that you do.

Respectfully,
Melvin Mohr, retired PE.
Garden City, Idaho
83714

11/18/2019

RECEIVED

Dr. Rick Aman
7263 Southern Vista Crt
Star, ID 83669
208.850.6707

2019 NOV 20 AM 10: 29

IDAHO PUBLIC
UTILITIES COMMISSION

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

Pubic Testimony for December 3rd

Idaho Power has placed their customers and homeowners who have installed roof mounted solar into a one-sided and intolerable financial position given a letter sent to net metered customers dated October 23, 2019.

As a homeowner and producer of grid energy in Star, Idaho, I relied upon Idaho Power's program of net metering with a one-for-one credit for over production as the basis for the purchase and installation of a roof top solar system. The Idaho Power letter proposes a threefold change in net metering. Each of these three changes were unknown and unanticipated for homeowners making a decision to participate in net-metering.

1. Energy produced will shift to a net hourly format
2. Customers who produce more energy than they consume each hour will be credited at a wholesale rate per kwh and billed for usage at a retail rate.
3. There will be a shift over the course of this proposal to a wholesale rate of buy back at .044 per kwh. The result is that 1/2 of the excess energy produced by the homeowner will be confiscated by Idaho Power.

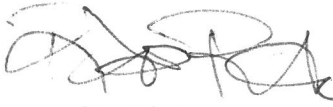
This proposal radically changed the program each of us as homeowners relied upon to make the financial decision to install solar. All the future calculations and payback factors were based on the current policy of one-for-one credit of power "banked" back into netting against future consumption on an annual basis, not hourly. I relied on these financial facts to make a rational decision for the investment into my system.

It would be the case for Idaho Power shareholders that any capital expenditures or accelerated depreciation would remain intact through the life of their generation assets once built. Given this proposal, the same consideration given to Idaho Power shareholders by the IPUC would not be afforded to Idaho Power customers who relied upon and entered into similar capital outlays in anticipation of stable net metering policies. The IPUC recently approved accelerated depreciation on the Valmy coal plant for Idaho Power. Given there are now lower cost generation resources available for Idaho Power, the IPUC did not disallow this previous capital outlay and leave the Idaho Power shareholders holding the financial bag. The IPUC was respectful of prudent decisions made at the time and did not punish the shareholders for unforeseen changes in markets and resources. Why would the same considerations not be afforded to Idaho Power

customers who made similar rational economic investments into roof top solar? The IPUC, whose charter is to protect the customers interests, should not retroactively permit polices like this proposal.

The solution for the IPUC is simple. Existing net metering customers who in good faith entered into the current policy need to be grandfathered in with the net metering program they accepted at the time the system was placed into service, through a reasonable system useful life of 20 years. If Idaho Power feels the need to implement such radical changes, apply those changes to new customers who are anticipating solar installation and provide them the courtesy to make an informed decision as to the financial and functional value of solar net metering.

Regards.

A handwritten signature in black ink, appearing to read "Dr. Rick Aman", with a horizontal line extending to the right from the end of the signature.

Dr. Rick Aman
Star, Idaho

To: Idaho Public Utilities Commission
Date: 11/15/2019
Subject: Idaho Power Plan to Reduce the Value of Solar System Generated Electricity
From: Robert Marcinko

RECEIVED

2019 NOV 20 AM 10: 29

IDAHO PUBLIC
UTILITIES COMMISSION

Sir/Madam,

It's hard to believe that the Idaho Public Utilities Commission (IPUC) is supporting the reduction of the value of electricity generated by residential solar systems. As a concerned citizen for climate change issues, even though I have very low use of electricity, I have gone ahead and had a residential solar system installed on my home. It will be years before I see a cost benefit from my system, if ever, at the current credit rate. By reducing the value of credit, I would most likely be long past and in my grave before a cost benefit would be seen. These proposed reductions definitely should not apply to existing residential systems.

In general, my cost return benefit is secondary to my primary concern of promoting future renewable energy utilization by everyone wherever possible. This needs to be your concern as well, in that by reducing the credit value of residential generated solar electricity, it will greatly reduce the desire by the general citizenry to make the decision to install residential solar systems. In discussions with several neighbors and friends, being able to afford to install a solar system is difficult to justify financially and seeing that the cost benefit is years down the road, makes it even harder and less desirable for them to have a solar system installed. This exists right now even with the present credit system. Reducing the value of credits will make this even more prohibitive.

It amazes me that Idaho Power is even considering this significant reduction as well as your commission approving it. For the IPUC to accept this for our future would be a continued promotion of the detrimental climate changes that are occurring.

Be a responsible global citizen and don't allow this reduction in the credit rate to apply to anyone, let alone existing solar system owners.



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