

Diane Holt

From: autoprecise@gmail.com
Sent: Monday, November 25, 2019 4:04 PM
To: Diane Holt
Subject: Case Comment Form: David Rodriguez

Name: David Rodriguez
Case Number: IPC-E-18-15
Email: autoprecise@gmail.com
Telephone: 2084209327
Address: 2595 E 4275 N
Filer ID, 83328

Name of Utility Company: Idaho Power

Comment: Regarding the proposed consumer power production rate changes: one of the reasons I installed a very expensive solar power generation system on my home was to stabilize the cost of energy for my home. Another reason was to reduce my impact on the environment. With the proposed rate changes for customers like me, there will be less incentive for consumers to install these environmentally friendly systems. I have no issue with paying a small percentage of my production to Idaho Power, but the proposed changes initially look to cost me upwards of %60 of my generation, which puts me back to paying more for energy. Ultimately, if we want more people to do what is best for the environment, it has to make sense financially. This needs to be more about what is best for the environment and the consumer, rather than increasing profitability for Idaho Power. I did not spend tens of thousands of dollars so that Idaho Power can figure out a way to make money off of me.

Unique Identifier: 164.165.206.42

Diane Holt

From: reidlofgran@gmail.com
Sent: Monday, November 25, 2019 2:44 PM
To: Diane Holt
Subject: Case Comment Form: Reid Lofgran

Name: Reid Lofgran
Case Number: IPC-E-18-15
Email: reidlofgran@gmail.com
Telephone: 208-358-0212
Address: 2190 East 1850 South
Gooding ID, 83330

Name of Utility Company: Idaho Power

Comment: We have made a significant investment into solar power. Under the rules that existed this was a reasonable investment, and made it worth doing. However, if the current net metering system is changed that changes the outlook of this investment for us. We came into this with the understanding and the promise of what the net metering would be. Changing now seems counterproductive to the progress being made in alternative energy. It also undermines the trust of all individuals who have moved forward with the promise of how it would work. While it is understandable that systems may have to change and adapt, it is not reasonable to change them when the parameters and standards have already been put into place and agreed upon by both parties. Had we known of this change we likely would not have found it feasible to invest in this project. Such a change now could have a huge impact on those who have invested in the system that was promised to them when they invested. Please consider grandfathering in those who already have made agreements, with the system of net metering we have already agreed upon and invested in. Thank you.

Unique Identifier: 164.165.206.42

Diane Holt

From: waive@magiclink.com
Sent: Monday, November 25, 2019 2:45 PM
To: Diane Holt
Subject: Case Comment Form: Waive Stager

Name: Waive Stager
Case Number: IPC-E-18-15
Email: waive@magiclink.com
Telephone: 208-543-6633
Address: 1626 East 3800 North
Buhl Idaho, 83316

Name of Utility Company: Idaho Power

Comment: I understand that the way Idaho Power handles the solar energy coming from private parties is being considered for change. I made a substantial investment in my solar system a couple of years ago with the expectation that my investment would pay for itself in about 13 years under the current net metering program. The changes I am hearing being proposed sound like they will greatly extend the payoff period on my investment. I would ask that current Idaho Power net metering customers be "grandfathered in" if the current system is changed. Thank-you

Unique Identifier: 164.165.206.42

Diane Holt

From: scottconnie777@gmail.com
Sent: Monday, November 25, 2019 3:12 PM
To: Diane Holt
Subject: Case Comment Form: Scott Harris

Name: Scott Harris
Case Number: IPC-E-18-15
Email: scottconnie777@gmail.com
Telephone: 208-634-3299
Address: PO Box 331, 86 ILKA Lane
McCall Idaho, 83638

Name of Utility Company: Idaho Power

Comment: We are opposed to IPC-E-18-15, Idaho Power's appeal to change the rates of reimbursement for net excess on-site energy production by customers. Their proposal is to cut in half reimbursements to both existing and new private power generating projects, including homeowner Net Metering customers. This would have a chilling effect on both existing and future alternative energy projects at precisely a time when Idaho Power should be encouraging such investments.

We decided, on retirement, that we wanted to make a responsible, environmentally sound investment, designing and installing a photovoltaic system which would produce 75% of our electricity needs. We had previously fallen for the Idaho Power "All Electric Home" encouragement, designing an energy efficient home with electric hydronic heating, only to watch our power bills increase exponentially in spite of our best efforts at efficiency and conservation.

The decision to proceed with the pv system was based on a projected 19 year payback, based on the current Idaho Power practices, encouragement and promises of support. We might have actually installed a larger system had "Net Metering" restrictions not come into play.

This new proposal, if allowed, would almost double the time needed for payback and increase our annual power bills by 40%. This is punitive and unfair to homeowners with existing systems, particularly those of us on fixed income.

This new attempt to restrict reimbursement would create a financial hardship on all of us with existing systems who installed them in good faith. It would have a stifling effect on new installations.

At the least, existing customers with home-based on-site generation should be excluded.

Sincerely,

Scott Harris
Connie Harris

McCall, Idaho

Unique Identifier: 164.165.206.42

Diane Holt

From: Diane Holt
Sent: Monday, November 25, 2019 9:25 AM
To: Diane Holt
Subject: FW: 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

Utility Company: Idaho Power

Dear Idaho Public Utility Commission,

Since we previously commented, several new documents have appeared, including a brief from Idaho Power and a brief from the IPUC staff. They offer excellent information and we feel compelled to comment.

IPUC staff has been concerned that Net Metering customers are not paying their share of cost of service. They calculated that non-solar customers are at this point subsidizing on-site solar customers, by 0.023% of their billings. Idaho Power argues that both future and existing on-site generators impact non-solar customers the same, and both classes should be held to the same billing standard. In other words, Idaho Power argues against "Grandfathering" existing Net Metering customers as they feel it is unfair. IPUC argues that the IPUC has broad discretionary powers and should respect that existing customers installed solar with Net Metering understood. They recommend an 8-year Grandfather to give those customers time to adjust.

We appreciate Idaho Power's concern regarding treating existing and future solar customers differently when their impact is the same.

We also very much appreciate the IPUC staff's nuanced recognition of the particular difficulty the compensation structure puts on existing small export customers.

While we do not disagree that on-site generators, solar residential or others, should be treated differently from non-generator customers, we believe the formula for export credit rate is deeply flawed, and for that reason, we implore the Commission not to accept the Settlement terms at this time.

The Settlement specifically does not address "Benefits" despite the fact that the initial petition set out to do precisely that. Notably, it is mentioned in its title.

Benefits not addressed and specifically called out by the Settlement include:

- Avoided Transmission and Distribution Capacity
- Avoided Transmission and Distribution Line losses
- Environmental Benefits

Other benefits called out in the many comments on the Settlement are also not included in the formula determining the export credit rate.

What is more, as aptly pointed out by the IIPA in its comments and acknowledged in the Settlement, the compensation formula treats all exported energy the same, although it clearly is affected by many factors and is not consistent.

Finally, Idaho Power's proposed schedule does not include reducing rates for the non-solar customers by the 0.023% that the IPUC staff calculated that they are paying to support on-site solar. Therefore, the compensation formula for exported energy as proposed means the cost of service (as outlined) would effectively be paid for TWICE. On its face, that cannot be considered acceptable or fair.

We believe that these omissions substantially effect the resultant calculation of the export credit rate and should be remedied prior to moving forward with the planned change.

Again, we are deeply grateful for this opportunity to comment.

Dave and Ingrid Burica

Diane Holt

From: brent.kidder@gmail.com
Sent: Monday, November 25, 2019 2:24 PM
To: Diane Holt
Subject: Case Comment Form: Brenton Kidder

Name: Brenton Kidder
Case Number: IPC-E-18-15
Email: brent.kidder@gmail.com
Telephone: 2089217930
Address: 2003 W DORA ST
BOISE Idaho, 83702

Name of Utility Company: IDAHO POWER

Comment: I am writing to comment on the recent changes Idaho Power is requesting that will cut the rate they pay customers who generate power with rooftop solar panels. This change in 'net metering' is counter to their goal of 100% clean energy...and also flies in the face of normal business practices.

We recently removed a tree by our house in Boise and our roof is now exposed to the sun. (I know Idaho Power is happy we will be running our air conditioner more- more power will be purchased from them.) We did an analysis and it really can start to make business sense to put solar panels on our rooftop, which would generate power and we would be reimbursed for the excess power. Excess power generated would go into the Idaho Power system, which they have said was their overall goal with the 'smart grid' the United States is attempting to install. However, we have NOT moved forward with this project just because Idaho Power (and the PUC, which seems to take their arguments and numbers as more important than people like me) comes up with these 'changes' to the current system of net metering (which they fought, I recall) and I have to wonder whether future changes will make the solar investment a loss for me and our community.

This is the same reason why the 'goal' of having electric cars in peoples' homes being plugged into the electrical grid so they can provide power at peak hours from the car batteries; they will be recharged when demand goes down and the power runs into the vehicle at, say, 2 AM. I am confident Idaho Power will gladly take the energy at a lower price and replace it at the higher 'standard' cost. Why should I participate in this system that favors these multi-million dollar utilities over individuals like my family.

I am asking you to reject this change that Idaho Power is requesting in IPC-E-18-15. They continue to resist solar and wind generation when it is done by individuals and small groups, but are 100% enthusiastic when it comes to investing in HUGE projects like the Jackpot Holdings contract. They tout that they will purchase power at a low price (but note it might pay a 'slightly higher price' later) while at the same time want you to OK these changes lowering what they pay to individuals who generate solar power on their own rooftops. Don't do it!

And also please make a public commitment to Solar Energy and individual power generation so people like me, who are looking at investing in this technology, can have some confidence in what the future holds in Idaho.

Thank you.

Unique Identifier: 164.165.206.42

Diane Holt

From: kinkadealvena8@gmail.com
Sent: Monday, November 25, 2019 2:32 PM
To: Diane Holt
Subject: Case Comment Form: Alvena Kinkade

Name: Alvena Kinkade
Case Number: Solar Energy Docket IPC-E-18-15
Email: kinkadealvena8@gmail.com
Telephone: 2086589081
Address: 10937 W Linstock Ct
Boise ID, 83713

Name of Utility Company: Idaho Power
Comment: I'm writing to voice my objection to Solar Energy Docket IPC-E-18-15.

I had Solar Panels installed on my house in 2017, and understood that the 'net metering' program would remain as it has always been. Now, Idaho Power is trying to change that program. In my opinion, It is unfair to force existing solar owners into the new program, given it will significantly reduce the value of their investment.

The PUC has said that they can "assure Idaho Power's customers that discriminatory rates will not follow from the outcome of this case". If changes are implemented that negatively impact customers' solar investments, it would be discriminatory. This new program seems totally discriminatory to me!

Approving a net metering policy that encouraged investment for long term savings, only to have it invalidated in this manner, is unethical. We expect more from our appointed officials on the PUC and our public utility. If you had no intention of honoring the service agreement you set out initially, you shouldn't have even made it an option.

It seems to me those of us who have been on the original 'net metering' program should be 'grandfathered', and continue the way it was originally set up.

Thank you.

Yours Truly,
Alvena Kinkade

Unique Identifier: 164.165.206.42

Diane Holt

From: karensteenhof@gmail.com
Sent: Monday, November 25, 2019 2:02 PM
To: Diane Holt
Subject: Case Comment Form: Karen Steenhof

Name: Karen Steenhof
Case Number: IPC-E-18-15
Email: karensteenhof@gmail.com
Telephone: 2083372355
Address: 18109 Briar Creek Road
Murphy ID, 83650

Name of Utility Company: Idaho Power Company

Comment: As a resident of Idaho who installed residential solar panels in 2014, I am deeply concerned about the proposed settlement, which would decrease the value of credits that I receive from Idaho Power for electricity that I generate under their net metering program. I have an 8.25 kW system consisting of 30 panels on my barn roof in Murphy, Idaho. After having solar for only 5 years now, I have not yet reached my return on investment. It is unfair for Idaho Power to go back on their promised agreement, which was the basis for my decision to invest in solar panels. I was hoping to add more panels when I could afford it, but if these new rules are in place, this will be cost-prohibitive. This proposal could cost me and the other 4,000 plus Idaho families that have invested in rooftop solar thousands of extra dollars on our electricity bills. Those of us who invested early in local, clean energy should not be penalized for doing the right thing at the right time. We acted in good faith, and Idaho Power should keep up their end of the bargain. The rules shouldn't change after families and individuals have already made their investments.

Climate change is already threatening our infrastructure and our environment in many ways. Now is not the time to discourage innovative clean energy solutions. Residential solar energy will be a critical part of a more reliable, sustainable energy future for Idaho. I urge you to allow existing customers to stay on the existing net metering program.

Unique Identifier: 164.165.206.42

Diane Holt

From: seikel@ida.net
Sent: Monday, November 25, 2019 2:11 PM
To: Diane Holt
Subject: Case Comment Form: Tony Seikel

Name: Tony Seikel
Case Number: IPC-E-!*-5
Email: seikel@ida.net
Telephone: 2087753183
Address: 367 West McNabb Rd.
Inkom ID, 83245

Name of Utility Company: Idaho Power

Comment: We have recently installed solar panels to reach 98% of our usage capacity for electricity. Idaho Power is proposing to cut the compensation for power created by external private sources (e.g., solar panels on homes) by about 50%. The reason we invested in this system was to try to reduce, by a very tiny amount, our impact on the environment, and we will have achieved this goal. Unfortunately, this change in fee structure will cause our financial recovery period to greatly increase. I would propose that, at the very least, existing customers be permitted to retain the current fee structure. In reality, this is a very greedy move by the power company, at time when solutions to global warming should be balanced with stock-holders dividends. This decision will hinder further solar investments by consumers, which is not in the interest of Idaho's independence from out-of-state energy sources.

Unique Identifier: 164.165.206.42

Diane Holt

From: gouldgarage@gmail.com
Sent: Monday, November 25, 2019 1:44 PM
To: Diane Holt
Subject: Case Comment Form: Jamie Gould

Name: Jamie Gould
Case Number: IPC-E-18-15
Email: gouldgarage@gmail.com
Telephone: 208-546-1916
Address: 1050 Meadowbrook Ln.
Nampa Idaho, 83686

Name of Utility Company: Idaho Power

Comment: I am submitting this to request the PUC uphold the original program rules that were agreed upon by Idaho Power and solar companies for existing solar customers. I ask that the same KWh cost be credited for what is billed. I am not in favor of Idaho Power's proposed new net metering rates. That is not what I agreed to when we installed our system.

We recently added solar panels to our home in April 2019.

Allowing existing solar customers to stay on the existing net metering program and applying the new program ONLY to new customers is a more commonsense compromise that allows all parties to keep agreements made in good faith. It is unfair and un reasonable to change the rules after installing solar due to the cost and averaging the payback on the investment. New customers going to solar will know about the rate change and will know they will not receive full credit on the net metering. It is unethical to change the agreement for existing customers.

Unique Identifier: 164.165.206.42

Diane Holt

From: matwood@asu-nvg.com
Sent: Monday, November 25, 2019 12:25 PM
To: Diane Holt
Subject: Case Comment Form: Michael Atwood

Name: Michael Atwood
Case Number: IPC-E-18-15
Email: matwood@asu-nvg.com
Telephone: 208-250-6188
Address: 1204 Warm Springs Avenue
Boise Idaho, 83712

Name of Utility Company: Idaho Power

Comment: I am writing in opposition to the new proposed rules and all things in the settlement regarding onsite customer generated power.

Comments:

1- We believe that the original agreement we entered into with Idaho Power when we purchased and installed our solar panels should be grandfathered and upheld for at least 10 years in order to recoup our initial investment.
2- We believe that the IPUC should protect those of us that move forward in establishing alternate energy sources rather than being penalized because Idaho Power is not making enough profit from us or that this is an inconvenience to them.
3- Grandfather in current customers. Let new potential solar customers make their decision in the future. Current customers don't have that opportunity and shouldn't be held to the new rules. It is our opinion that the new rules will discourage solar power and onsite generation.
Please protect those of us that have made the financial commitment for solar power and those who may choose to do so in the future.

Unique Identifier: 164.165.206.42

Diane Holt

From: ann.sandven@gmail.com
Sent: Monday, November 25, 2019 11:10 AM
To: Diane Holt
Subject: Case Comment Form: Ann Sandven

Name: Ann Sandven
Case Number: IPC-E-18-15
Email: ann.sandven@gmail.com
Telephone: 2088614651
Address:
Boise ID, 83702

Name of Utility Company: Idaho Power

Comment: I am very upset about Idaho Power's plan to reduce the rate that those of us who have already installed solar panels on our roofs would be reimbursed for the electricity we produce.

We paid over \$40,000 to install solar on our North End home in Boise. This expense seemed justified at the time by the years we plan to live in this house, as well as our past electricity bills.

Penalizing us for having made this capital investment in the face of Idaho Power's stated goal to use 100% clean energy sources in the near future flies in the face of fairness, good governance, and good stewardship of our environment.

Please ensure Idaho Power is fair and "Grandfathers" in those of us who have installed solar based on the existing rates and rules at the time to keep our current rates.

Thank you, Ann Sandven

Unique Identifier: 164.165.206.42

Diane Holt

From: ann.joslin52@gmail.com
Sent: Monday, November 25, 2019 11:02 AM
To: Diane Holt
Subject: Case Comment Form: Ann Joslin

Name: Ann Joslin
Case Number: IPC-E-18-15
Email: ann.joslin52@gmail.com
Telephone: 2084847673
Address: 1750 W Washam Rd
Eagle Idaho, 83616

Name of Utility Company: Idaho Power

Comment: I write to request that the IPUC allow existing solar customers to stay on the net metering program under which we are currently operating.

Our rooftop solar installation began generating power in February 2018. In 6 of the remaining 10.5 months of that year, our system produced more energy than we used; the resulting credits meant that in 6 months our only payments to Idaho Power were service charges, franchise fees, and energy efficiency fees. To date in 2019, our system produced credits in each of 4 months and in 2 other months, our Idaho Power energy usage was minimal. These production credits are an important and valuable part of our return on investment (ROI).

It is obvious that if existing solar customers are transitioned to the new net metering program, it will seriously reduce the value of our investment – and result in a much higher cost than we planned. With the phased-in decreases in the value of our credits, our “break-even” point estimate is extended from 12 years to 24 years. My husband and I are both past official retirement age, and despite our interest in solar, we very likely would not have installed it had we expected that lengthy ROI.

We applaud Idaho Power’s goal to provide 100-percent clean energy by 2045. Unfortunately, its proposed new net metering rate for existing solar customers seems at odds with that goal. We have made a large, up-front investment in solar, so it seems fair that our production credit rate remain as it was when we started - the same as the rate all customers pay Idaho Power for electricity, not cut in half. It also seems fair that the credit rate not be reduced after we have committed to this investment.

Please do not approve Idaho Power’s proposed new net metering program for existing solar customers. The proposal is not in the best interest of the public. Allow those of us who have made this investment in clean energy to continue receiving the same value for the excess power we send back to the grid as when we agreed to the terms of the program.

Unique Identifier: 164.165.206.42

Diane Holt

From: capri.91958@hotmail.com
Sent: Monday, November 25, 2019 9:42 AM
To: Diane Holt
Subject: Case Comment Form: Cathy Priest

Name: Cathy Priest
Case Number: IPC-E-18-15
Email: capri.91958@hotmail.com
Telephone: 208-761-7083
Address: 5096 S Seminole Pl
Boise Idaho, 83709

Name of Utility Company: Idaho Power

Comment: My husband and I decided to add solar panels to our home for several reasons. They produce cleaner energy, and in the long run after the loan is paid off they will save us money on our power bill, this will help us significantly when we are on a fixed income in the near future. We figured the investment at this time when we can afford it will pay off for us then. Idaho Power seems to want it all. Over time their plan would cut into the benefit to us significantly. As it is now we are producing way more energy than we consume and where does that go??? To Idaho Power. in Oct our production at the high end was 28kWh and consumption was 2.9 kWh. My opinion is Idaho Power is already benefiting plenty and should be happy with that. But they have always been the only game in town and their greed is fogging their vision This is my opinion. We were sold a bill of goods and now Idaho Power is trying to change the game on us. Just not right!!!
Cathy Priest

Unique Identifier: 164.165.206.42

Diane Holt

From: grnhornet48@gmail.com
Sent: Monday, November 25, 2019 8:49 AM
To: Diane Holt
Subject: Case Comment Form: Ronald & Deborah Greene

Name: Ronald & Deborah Greene
Case Number: IPC-E-18-15
Email: grnhornet48@gmail.com
Telephone: 503-504-2833
Address: 23742 State Line Rd
Parma Idaho, 83660-7003

Name of Utility Company: Idaho Power

Comment: Hello, we recently invested in a onsite power system at the address listed above, solar. The investment cost in excess of \$45k. The current agreement provides the excess power generated by us is put on the grid for other customers to use. When we do not produce enough power the power company provides the excess power we produced back as needed. This is the agreement we committed to as it will be ten years to pay the system off. We see no fair reason the change this for existing customers. I urge you to re consider changing the agreement for existing customers.

Unique Identifier: 164.165.206.42

November 18, 2019

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2019 NOV 25 AM 9:53

IDAHO PUBLIC
UTILITIES COMMISSION

IPUC

Please correct me if I am wrong. Idaho power tells me to conserve electricity, so I do my part. I wash in cold water and use a clothes drying line. I switch to using low flow toilets and LED light bulbs. All appliances purchased are now energy efficient. I invest considerable money in solar panels. The above scenario should result in my energy savings as well as smaller energy costs. But no—this means Idaho Power wants to raise my bill to cover the cost of the energy I am saving. So the long and short of it is this: Idaho Power customers who exercise energy savings (promoted by Idaho power I might add) are going to have rate hikes to make up for “revenue lost” to Big Brother Idaho Power.

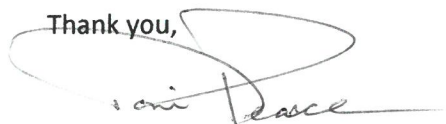
The score then becomes Idaho Power win-win and the lowly customer lose-lose. Customers beware—use too much power-costs go up—conserve power costs go up. The rule of supply and demand does not seem to apply here. Idaho Power is a monopoly and there are 100s of new customers so why are the energy savers being punished? With all the new customers, Idaho Power is sure to make up “any loss of revenue” from the energy savers.

Solar panel investors were promised 1 credit for 1 kilowatt generated so customers invested considerably. On-site generation is promoted and even Idaho Power invests in solar power. But now my investment becomes their benefit by their proposed new “power grab.” Again, help me understand this! I incur the costs of the initial investment and (believe the promise of 1 kilowatt credit per 1kilowatt generated), and now Idaho Power can take the power I generate. If they are partial owners of my system then I want their portion of payment for my investment. This is the classic “bait and switch” which only big companies and governments get away with.

So now what do I get? Well, I get to write a letter! Perhaps there could be a rate reduction in the salaries of Idaho Power CEOs. That will never happen because raising my rate guarantees them a higher salary.

For the above reasons I am hopeful that IPUC can help protect Idaho customers by not approving this very obvious power grab.

Thank you,

A handwritten signature in black ink that reads "Toni Pearce". The signature is written in a cursive style and is positioned below the text "Thank you,".

Toni Pearce

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2019 NOV 25 AM 9:52

IDAHO PUBLIC
UTILITIES COMMISSION

November 18, 2019

IPUC,

We recently received a letter from Idaho Power explaining rate changes they have presented to the IPUC for residential on-site generation customers. We request the IPUC to "Grandfather" existing customers with the rate structure Idaho Power agreed upon when the solar panels were installed. We would not have invested in solar panels if we knew Idaho Power would change the rate structure.

Their proposal is a "power grab." We invested \$35,000+ to accumulate over 4,000 kilowatt hours in credits during the summer to use during the winter to heat our home. Idaho Power intends to eliminate this opportunity and then transition to a new pricing structure. After eight years the retail rate will have dropped from 8.7 cents per kilowatt hour to 4.4 cents with no monthly accumulation allowed. What a rip-off!

As a monopoly, Idaho Power is guaranteed a profit. Customers' on-site residential investments should be equally important. We mutually agreed upon the rate structure and the accumulation of monthly credits and Idaho Power should not be able to change them. Exempting existing customers from the "new" regulations seems like the only fair thing to do. During the 25 years our solar panels are supposed to last we should be able to recoup our investment and earn money to replace them.

I am 89 years old and made this investment to help my wife/widow after I die. She deserves to reap the benefits of this investment.

Sincerely,



Mel Pearce

November 22, 2019

Idaho Public Utilities Commission
PO Box 83720
Boise, Idaho 83720-0074

RECEIVED
2019 NOV 25 AM 9:52
IDAHO PUBLIC
UTILITIES COMMISSION

re: Case IPC-E-18-15 (request by Idaho Power to change methodology and rate structure by which existing home power producers can sell excess electricity to Idaho Power Company)

Commissioners,

I write in opposition to Idaho Power Company's request to change the formula by which existing home power producers sell excess electricity generated by residential solar panels to Idaho Power.

My wife and I have been Idaho Power customers for the past 32 years at our current residence. In 2018 we had solar panels installed on our roof primarily to do our part to combat climate degradation but also to mitigate anticipated escalation of electrical cost over time. The decision to purchase the panels was heavily influenced by the calculation of expected savings to our monthly electric bill. It has been estimated from an analysis done by the Idaho Conservation League and Vote Solar that Idaho Power's request to change the compensation structure would increase the average monthly electricity bill for existing home power producers by 25%. I was unable to independently calculate my own estimate because of the convoluted structure of the new formula. Nevertheless, such an increase would drastically alter the cost premises that were used to make the decision to purchase our panels and render that decision, ultimately, as likely not worth the effort and cost.

Idaho Power's request amounts to changing the rules in the middle of the game and would be unfair to those customers with existing solar panels who made major investment decisions to purchase those panels based upon the current formula. Moreover, conversion to a pricing structure based on net hourly usage would be impossibly complicated for customers to understand and monitor.

We, therefore, strongly urge the Idaho Public Utilities Commission to preserve the present formula for sale of excess electricity to Idaho Power for home customers currently utilizing the program.

Sincerely,



Kenneth and Sarah Harris
1467 Falls Ave West
Twin Falls, ID 83301
208-404-9267
sjharris@cableone.net

841 Rim View Ln. E

Twin Falls ID 83301

November 23, 2019

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2019 NOV 25 AM 9:51

IDAHO PUBLIC UTILITIES COMMISSION

Idaho Public Utilities Commission

PO Box 83720

Boise ID 83720-0074

Dear Commission Members:

When we installed 22 solar panels on our house roof in April 2018, we had a genuine feeling of partnership with Idaho Power. They espoused green energy production and consumption, provided a great net metering arrangement with banking of excess production, and we provided them with electricity in the summer months when demands on them are high due to heavy air conditioning and agricultural pumping demands. Our excess production could flow directly to our close neighbors and did not incur high transmission cost.

We first became uneasy when Idaho Power put us in a new customer classification. Their explanation was that other customers were subsidizing net metering customers. We didn't understand how that was possible, since we pay a monthly basic charge and since we were providing them with power that doesn't need to be transmitted through expensive installations.

When we received a letter from Idaho Power in September 2019 notifying us of a new net metering policy to go into effect January 1, 2020, it was as if our relationship had suddenly become adversarial and that we were being punished for installing solar panels. Suddenly, our green energy production was inferior to other green energy sources. Not only will we be subject to incremental reimbursement rate decreases for our excess kilowatt hours, but also the determination for accumulated kilowatt hour quantity will be changed to our disadvantage.

We feel sad that the new policies will probably discourage potential rooftop solar investment in Idaho and are also hurt that existing customers must deal with an unexpected financial loss. Please consider whether or not this is a fair move on the part of Idaho Power.

Sincerely,



Jeff Ruprecht

Diane Holt

From: jgalgano@hotmail.com
Sent: Monday, November 25, 2019 8:40 AM
To: Diane Holt
Subject: Case Comment Form: JOHN GALGANO

Name: JOHN GALGANO
Case Number: IPC-E-18-15
Email: jgalgano@hotmail.com
Telephone: 2087202996
Address: 180 CLOVERLY LN
HAILEY ID, 83333

Name of Utility Company: Idaho Power

Comment: • The PUC should uphold the original program that was agreed upon by Idaho Power and solar customers. Idahoans have invested in local clean energy expecting a fair deal.

- Idaho families and small businesses shouldn't have the rules changed on them after they have already made their investment.
- The new proposal could cost existing solar customers thousands of dollars on their electricity bills.
- Allowing existing solar customers to stay on the existing net metering program and applying the new program only to new customers is a commonsense compromise that allows all parties to keep agreements made in good faith.
- When changing net metering, utilities and commissions around the nation allow existing customers to keep the original terms, because it's unethical and unfair not to.
- Maintaining existing utility rates and terms for existing customers is a very common practice for other utilities in the region making similar changes – it's reasonable to expect the same for Idahoans.
- The PUC promised that discriminatory rates would not be the outcome. If changes are implemented that negatively impact customers' solar investments, it would be discriminatory. They need to hold true to their word.
- Idaho families and businesses 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, is unethical. We should expect more from our appointed officials on the PUC and our public utility. 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.

Unique Identifier: 164.165.206.42

Diane Holt

From: andy.tranmer@gmail.com
Sent: Sunday, November 24, 2019 9:04 AM
To: Diane Holt
Subject: Case Comment Form: Andy Tranmer

Name: Andy Tranmer
Case Number: IPC-E-18-15
Email: andy.tranmer@gmail.com
Telephone:
Address:
Boise ID, 83706

Name of Utility Company: Idaho Power

Comment: Dear IPUC,

Long-term sustainability of energy infrastructure is critical to support the residents of Idaho, which will include both facilities that produce energy and transport it. Historically public utilities have provided both services, but local production at residences and commercial locations via solar panels has increased and will likely increase further in the future. This trend of local energy production should be supported to increase the resilience of the energy grid as the population of Idaho grows. The substantial investment that is required to build a solar array should be acknowledged as it helps to offset peak loads in the summer.

The public utilities maintain the service network linking production to distribution and it is fundamental to support this piece of the energy grid. However, it is also fair to support the people that have invested in local energy production under the expectation of net metering by providing them with equitable credits for energy returned to the grid. This credit should be priced according to what they produce and not reduced. Local solar production should be incentivized and rewarded in any way possible to further build resilience into our critical energy infrastructure.

Unique Identifier: 164.165.206.42

Diane Holt

From: Ratorm593@gmail.com
Sent: Sunday, November 24, 2019 9:40 AM
To: Diane Holt
Subject: Case Comment Form: Rob Storm

Name: Rob Storm
Case Number:
Email: Ratorm593@gmail.com
Telephone:
Address:
Twin Falls Idaho, 83301

Name of Utility Company: Idaho Power

Comment: First, I support alternative energy production, but not at added cost to consumers. Currently electrical users pay higher rates because of producers of extra solar electricity. This government subsidy is not fair and should be ended. Some day solar and wind energy will be competitive on the open market, until then, please don't ask citizens to pay higher rates to supplement incomes of solar producers. Remember that solar producers were informed up front that rates may change.

Unique Identifier: 164.165.206.42

Diane Holt

From: english@easystreet.net
Sent: Sunday, November 24, 2019 1:19 PM
To: Diane Holt
Subject: Case Comment Form: Tom English

Name: Tom English
Case Number: IPS-E-18-15
Email: english@easystreet.net
Telephone: 2088999694
Address: 13691 Pillar Rock St.
Caldwell ID, 83607-5478

Name of Utility Company: Idaho Power

Comment: I understand this case involves how much Idaho Power should pay homeowners for their excess solar power that is placed back into the grid. If this case number is wrong, please forward.

I am totally against this excess power being reimbursed at retail rates. I am in favor of paying solar excess at wholesale rates.

We do not have solar and object to subsidizing household solar suppliers avoiding supporting the maintenance of infrastructure. Due to the indeterminacy of solar generation, Idaho Power must also have backup sources of electricity for each KW of solar generation. A further burden on Idaho Power as infrastructure utilization (idling generation when the sun does not shine) must be paid for yet not always in use.

Due to this indeterminacy issue, a case could be made that excess solar KW placed back into the grid should be lower than wholesale.

Thank you

Unique Identifier: 164.165.206.42

Diane Holt

From: bryce.sargent@gmail.com
Sent: Sunday, November 24, 2019 6:29 PM
To: Diane Holt
Subject: Case Comment Form: Lloyd Bryce Sargent

Name: Lloyd Bryce Sargent
Case Number: IPC-E-18-15
Email: bryce.sargent@gmail.com
Telephone: 208-785-5450
Address: 843 Robert Street
Blackfoot Idaho, 83221

Name of Utility Company: Idaho Power

Comment: I paid Big Dog Solar approx \$57,000 with understanding that we would produce power during the day and then use Idaho Power at night. A meter as installed by Idaho Power that would measure and keep track of how much power we produced so that Idaho Power could give us credit so that we would not have a Power Bill or a very small power bill. We are still paying off the finance company and will be for approx 10 years. Please see that we are grandfathered into 1:1 net metering. Anything else is highly unethical.

Unique Identifier: 164.165.206.42

Diane Holt

From: lauralynsargent@gmail.com
Sent: Sunday, November 24, 2019 6:35 PM
To: Diane Holt
Subject: Case Comment Form: Lauralyn Sargent

Name: Lauralyn Sargent
Case Number: IPC-E-18-15
Email: lauralynsargent@gmail.com
Telephone: 208-785-5450
Address: 843 Robert Street
Blackfoot Idaho, 83221

Name of Utility Company: Idaho Power

Comment: We recently placed 52 solar panel in our side yard to help reduce or eliminate our present power bill (as we are all electric). We have received two bills since it was finally completed and hooked up. We are please with the results. We are an older couple and spent a considerable about of money for the Solar Panels. We are concerned with the changes being proposed and would like to be grandfathered in to 1:1 net metering. We feel this is the only fair and logical way to do this. We bought and had these Solar Panels placed with the assumption that this would be a benefit to us, as well at the utility company, in the long run. We are asking you to reconsider the proposal and think of the customers that are trying to actually help by putting forth the expense to put in the Solar Panels. We should benefit from doing this and be grandfathered in to the 1:1 net metering. Thanks for your consideration in this matter. Lauralyn Sargent of Blackfoot, Idaho.

Unique Identifier: 164.165.206.42

Diane Holt

From: rfereday@mayhardware.com
Sent: Sunday, November 24, 2019 7:28 PM
To: Diane Holt
Subject: Case Comment Form: Rick Fereday

Name: Rick Fereday
Case Number: IPC-E-18-15
Email: rfereday@mayhardware.com
Telephone: 2086347665
Address: May Hardware, 809 N 3rd St
McCall ID, 82638

Name of Utility Company: Idaho Power

Comment: Very concerned that Idaho Power is changing the net metering rules. We are just finishing a 70 KW PV system. When we made the decision to install this system (about a year ago) we factored into the decision the current rules on metering. Now we hear that those rules may change. The main reason that May Hardware is installing solar is due to our concerns about the environment followed closely by the fact that this will save us money in the long run. It is disturbing that Idaho Power is not following their advertised goal of environmental stewardship.

Rick Fereday
May Hardware

Unique Identifier: 164.165.206.42

Diane Holt

From: kim.beswick@memjet.com
Sent: Sunday, November 24, 2019 7:55 PM
To: Diane Holt
Subject: Case Comment Form: Kimberly Beswick

Name: Kimberly Beswick
Case Number: IPC-E-18-15
Email: kim.beswick@memjet.com
Telephone: 208-573-4349
Address: 12436 N. Upper Ridge Place
Garden City Idaho, 83714

Name of Utility Company: Idaho Power

Comment: In 2018 I spend \$43,000 on a solar installation for my home. This was consistent with Idaho Power's stated goals for transitioning to 100% green energy over the coming years.

Given the Idaho Power Net Metering rates in place at the time, my payback period is estimated to be over 12 years.

I assume these rates were in place to incent personal investments in solar power. I put considerable thought into my investment in solar, very much counting on the return that the Net Metering rates would afford me in the future.

It's important that the PUC hold up it's end of the bargain and honor the investments that I and others like me have made. Changing these rates will dramatically decrease the benefits of the system I installed, and dramatically lengthen the expected ROI time period to well beyond my retirement years and expected time in my home.

Beyond all of this, allowing individual solar installations to continue at a healthy rate, inspired by healthy net metering rates, diversifies the power generation that the state needs and moves us closer to a 100% green power generation region. Using the investment of willing citizens to build this infrastructure is a benefit to Idaho Power, just as Idaho Powers infrastructure is a benefit to us all.

Please keep the rates that you have in place today, both to be fair to those who have already invested in solar power generation and to continue to expand investments in citizen and business funded solar.

Best regards,
Kim Beswick

Unique Identifier: 164.165.206.42

Diane Holt

From: ghuffaker@gmail.com
Sent: Sunday, November 24, 2019 8:31 PM
To: Diane Holt
Subject: Case Comment Form: Glen Huffaker

Name: Glen Huffaker
Case Number: IPC-E-18-15
Email: ghuffaker@gmail.com
Telephone: 2088597344
Address: 11068 Musket St.
Boise Idaho, 83713

Name of Utility Company: Idaho Power

Comment: I made an investment in rooftop solar a little more than a year ago. Any reduction lowering Net metering payback will negatively impact my investment and the resale value of my home. Furthermore, Idaho power should be doing more to encourage residential solar, not less. I feel that solar is one way that I can do something to better the environment. I am grateful for the excellent opportunity that Idaho Power has partnered with me in this endeavor. I don't wish to back out and I expect Idaho power to hold up their end of the bargain and not back out either. Since I've been able to get roof top solar, I've seen more neighbors do the same. It's a good trend, and we must keep it up. The outlook is good, please don't lower net metering returns.

Unique Identifier: 164.165.206.42

Diane Holt

From: john@idahogreenworks.com
Sent: Sunday, November 24, 2019 9:02 PM
To: Diane Holt
Subject: Case Comment Form: John Reuter

Name: John Reuter
Case Number: IPC-E-18-15
Email: john@idahogreenworks.com
Telephone: 2087212922
Address: 106 N COVE LN
HAILEY ID, 83333-5086

Name of Utility Company: Idaho Power

Comment: I am writing to oppose proposition IPC-E-18-15. Specifically I feel that existing clients should be grandfathered into the existing rates. While Idaho Power's application did not state that rates could change prior to establishing a new rate class 2 years ago.

If Idaho Power thinks that solar customers use the grid without paying for it, then they could charge a monthly fee for access to the grid. Cover the per-customer cost for grid connection, and they allow a customer to off-set their consumption with solar power.

Idaho Power claims they want 100% renewable energy. It's clear to me that they want 100% control.

Thank you,
John Reuter

Unique Identifier: 164.165.206.42

Diane Holt

From: whoisha@gmail.com
Sent: Saturday, November 23, 2019 9:30 AM
To: Diane Holt
Subject: Case Comment Form: Laura Hubbard

Name: Laura Hubbard
Case Number: IPC-E-18-15
Email: whoisha@gmail.com
Telephone: 2087207715
Address: 530, E. McKercher Blvd
Hailey ID, 83333

Name of Utility Company: Idaho Power

Comment: The purpose of this comment is to express my opposition to Idaho Power's proposed changes to the rates and programs of solar, rooftop net metering.

I invested in solar and deserve fair net metering and predictability. This is in line with the stated purpose of Idaho Power to move off coal and onto renewables. Residences and businesses deserve predictability in expenses -something Idaho Power must appreciate. Allowing Idaho Power to change the net metering creates a disincentive to others for rooftop solar and economically punishes me and others.

Further, customers, like myself, deserve to see the full study before any changes are made to rates and programs.

Idaho Power's proposal to decrease the value of credit I receive for the excess electricity I send back to the grid will decrease over time so it is 50% lower than it is today. I made this investment for the health of Idaho. I made this investment to help myself and Idaho Power move to renewables. Don't let the profit and desire for monopolistic control by Idaho Power punish individuals like me and the careful analysis of the investment I made. It is unfair to me and would create a perverse policy decision inhibiting the ability of others to rely on Idaho Power or invest in clean energy - our shared purpose.

Further, if Idaho Power's proposal is accepted it will cost me thousands of dollars and is simply not fair.

We need a long term focus which allows both utilities and customers to keep agreements made in good faith and drives good policy of encouraging renewables both in large solar arrays that only Idaho Power can develop and rooftop arrays that residences and businesses can invest in and contribute to our shared purpose.

Unique Identifier: 164.165.206.42

Diane Holt

From: Lindyco10@gmail.com
Sent: Saturday, November 23, 2019 9:40 AM
To: Diane Holt
Subject: Case Comment Form: Lindy Cogan

Name: Lindy Cogan
Case Number: IPC-E-18-15
Email: Lindyco10@gmail.com
Telephone: 2087205573
Address: 530 E. McKercher
Hailey Idaho, 83333

Name of Utility Company: Idaho Power

Comment: This comment is to oppose Idaho Power's proposed solar net-metering rate changes.

I'm one of the 4000 plus Idahoans who invested in roof top solar because I wanted to reduce my electricity costs and contribute to climate change solutions.

I would have put more solar arrays on my home except Idaho Power currently does not buy excess power generated by residential rooftop solar and will only credit me for my own personal use.

If Idaho Power is truly committed to Idaho's future and increasing renewable energy options, it would incentives homeowners to invest in the solar infrastrature on their rooftops. Instead Idaho Power wants to invest in solar arrays, which will increase the cost of electricity for everyone.

I understand Idaho Power's desire to be a monopoly and this further step of moniterizing kilowatt hours produced and reducing the value by 50% is just another step in Idaho Power's agenda to keep the monopoly on electricity.

I made my investment in solar based on the current rate arrangement and I will not recoup my investment with this proposed change in rates.

Also this proposal will disincentive anyone else from investing in solar.

Please do not approve this proposed change in rate.

Unique Identifier: 164.165.206.42 ✓

Diane Holt

From: crummy1810@frontier.com
Sent: Saturday, November 23, 2019 9:57 AM
To: Diane Holt
Subject: Case Comment Form: Barb Crumpacker

Name: Barb Crumpacker
Case Number: IPC-E-18-15
Email: crummy1810@frontier.com
Telephone: 2086643466
Address: 1015 East Lakeside Avenue
Coeur D Alene ID, 83814

Name of Utility Company: Idaho Power

Comment: I am asking that you do NOT limit the use of alternate energy sources like wind/solar/geothermal for the people of Idaho.

My neighbor burns wood & the smoke affects my health(I have asthma)& my neighbors all winter long.

The use of alternate sources only makes sense with climate impacts of natural gas, coal & wood. Our kids, grandkids & the future of the planet is at stake.

Unique Identifier: 164.165.206.42

Diane Holt

From: ken@kenbrait.com
Sent: Saturday, November 23, 2019 10:51 AM
To: Diane Holt
Subject: Case Comment Form: Kenneth Brait

Name: Kenneth Brait
Case Number: IPC-E-18-15
Email: ken@kenbrait.com
Telephone: 2085782456
Address: PO Box 5568
Ketchum ID, 83340

Name of Utility Company: Idaho PO Box 5568; Ketchum, Id 83340wer

Comment: Regarding the changes Idaho Power wants to make regarding solar panels, their request should be denied. Most people buy solar panels for environmental reasons. The payback of 7-10 years is not going to make anyone rich. What IP is proposing would make this purchase a major money loser. IP wants to protect itself, but protecting the citizens of Idaho is equally important. We all bought solar panels understanding the payback. To change the rules now is blatantly unfair. At the very least there should be a 20 year moratorium for those who have already purchased the panels. It is estimated that the cost to other residents is less than \$4/year. Fine, bill solar panel users an additional \$4/year. Also, while IP may be protected, those working on the solar industry in this state will be out of work as no one will want these panels. The cost to the state for unemployment will be more than IP's savings. Please reject IP's request. Thank you.

Unique Identifier: 164.165.206.42

Diane Holt

From: simsfam6@msn.com
Sent: Saturday, November 23, 2019 12:01 PM
To: Diane Holt
Subject: Case Comment Form: Bruce Sims

Name: Bruce Sims
Case Number:
Email: simsfam6@msn.com
Telephone: 2082937186
Address: 121 Teton Dr
Jerome ID, 83338

Name of Utility Company: Idaho Power

Comment: We are writing in regards to the recent application from Idaho Power to raise rates for existing and future customers who use solar power. We had solar panels installed this summer, 2019, the reason being, that we read that Idaho Power had a goal of using 100% renewable energy by 2045. We felt we were doing our part to help by buying our own solar panels/renewable energy. Now, that we are tens of thousands of dollars in debt (along with several of our friends who got solar), we read that Idaho Power wants to change the terms of our usage. How is that equitable to us?! We were willing to invest this money into the solar panels, based on what the terms Idaho Power agreed to give us, and now they want to change that, to be more equitable. To whom will that be more equitable? Not to us, now in debt thousands and thousands of dollars. We are flabbergasted that they would even consider this to be EQUITABLE. What we are asking you, the Idaho Public Utilities Commission, to do is: to totally reject their request, or at the bare minimum, grandfather all of us in, who invested in solar panels in good faith, based upon Idaho Power's goal to be totally renewable energy dependent by 2045, and the terms they gave us when we invested in the solar panels. Please, please reject their application. No one will ever invest in renewable energy if this passes, because it will not be financially feasible to do so.

Thank you for your time.

Bruce and Audrey Sims, Jerome, Idaho

Unique Identifier: 164.165.206.42

Diane Holt

From: susangjimk@gmail.com
Sent: Saturday, November 23, 2019 3:00 PM
To: Diane Holt
Subject: Case Comment Form: Susan Giannettino

Name: Susan Giannettino
Case Number: IPC- E-18-15
Email: susangjimk@gmail.com
Telephone: 2084844319
Address: PO Box 4914
Hailey ID, 83333

Name of Utility Company: Idaho Power Company

Comment: We strongly oppose any change in the contract we have with Idaho Power regarding the net metering associated with our household solar panels. We have been providing energy to the grid for about three years.

We installed solar at our home in part due to the agreement Idaho Power offered us. We compared what Idaho Power is doing to what is going on in other states and felt the agreement they offer is fair.

As existing customers providing solar to the system, we do not believe there should be any change.

Aside from the personal household cost of a change, I would suggest Idaho Power should be advocating household solar installation not disincentivizing it. It is disingenuous to say the least for Idaho Power to indicate a commitment to clean energy and argue for these changes. Clearly the clean energy commitment was a publicity stunt.

Unique Identifier: 164.165.206.42

Diane Holt

From: Laurestaw@gmail.com
Sent: Saturday, November 23, 2019 8:00 PM
To: Diane Holt
Subject: Case Comment Form: Lauresta Welty

Name: Lauresta Welty
Case Number: IPC-E-18-15
Email: Laurestaw@gmail.com
Telephone: 2085593673
Address: 2309 Malad St.
Boise ID, 83705

Name of Utility Company: Idaho Power

Comment: We have solar panels and made this investment to be net zero so we no longer have to pay for power, and are using clean energy. We had to take out a second mortgage on our house to pay for these solar panels, which will be harder to pay off if we now have to pay for power again each month. People who invest in clean solar energy are doing what is best for the earth and need to be able to have a way to afford it over the long term. Being net zero is what makes that possible. If Idaho Power changes our rates and again makes solar energy users pay for power then fewer and fewer people will be able to invest in solar energy, the energy that makes the most sense for the future of the planet and everyone on it.

If Idaho Power is concerned that too many people are now going solar, and that it will cause them to lose money a solution that would work for everyone is to grandfather in the current solar customers with the current net metering rate and then offer other customers the option to place solar panels on houses that could generate electricity from the sun. Those people who agree to have solar panels from Idaho Power would not pay for them, but would continue to pay a normal rate for their electricity. Idaho power invests in solar farms out by the interstate, and the electricity generated in those solar farms has to be transported to the areas that need it. Why not put solar panels on more roofs, where it is much closer to the houses that use it?

The PUC should uphold the original program that was agreed upon by Idaho Power and solar customers. Idahoans have invested in local clean energy expecting a fair deal. Idaho families and small businesses shouldn't have the rules changed on them after they have already made their investment. The new proposal could cost existing solar customers thousands of dollars on their electricity bills.

Allowing existing solar customers to stay on the existing net metering program is a commonsense compromise that allows all parties to keep agreements made in good faith. When changing net metering, utilities and commissions around the nation allow existing customers to keep the original terms, because it's unethical and unfair not to. Maintaining existing utility rates and terms for existing customers is a very common practice for other utilities in the region making similar changes – it's reasonable to expect the same for Idahoans.

The PUC promised that discriminatory rates would not be the outcome. If changes are implemented that negatively impact customers' solar investments, it would be discriminatory. They need to hold true to their word.

Idaho families and businesses 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, is unethical. We should expect more from our appointed officials on the PUC and our public utility. 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.

Unique Identifier: 164.165.206.42

Diane Holt

From: kwhite511@msn.com
Sent: Monday, November 25, 2019 12:47 PM
To: Diane Holt
Subject: Case Comment Form: Kenneth White

Name: Kenneth White
Case Number: IPC-E-18-15
Email: kwhite511@msn.com
Telephone: 5404226087
Address: 5010 Joe Lane
Nampa Idaho, 83687

Name of Utility Company: Idaho Power Company

Comment: CASE: IPC-E-18-15 Background Analysis and Candid Initial Findings, Recommendations

In the IPC-E-17-13 document, supportive rational to IPC-E-18-15, the testimony given by a representative of Idaho Power Company (IPC) includes Exhibit 5, a white paper – “Rethinking Rationale for Net Metering” By Barbara Alexander, Ashley Brown, and Ahmad Faruqui – Public Utilities Fortnightly October 2016. The IPC representative used Exhibit 5 in an attempt to make the case for modifying the net metering policy (IPC-E-18-15) and presented the contents of Exhibit 5 as being factual for Idaho – it is clearly not. The IPC representative states, and presents as fact, the idea that customer-generated solar electricity has no value. This paper firmly establishes that this is not true and reflects IPC’s business motivations.

This analysis is to bring to light that the use of information in Exhibit 5 in the Idaho environment is materially incorrect. In the body of IPC-E-17-13, Exhibit 5 is referenced for the “regression of net metering for low income to high income customers.” (i.e. cross-subsidy).

The author of IPC-E-17-13 neglects to consider the extraordinary value of the excess solar customer-generated electricity that is over and above customer’s consumption pushed to Idaho Power grid. Exhibit 5, “Rethinking Rationale for Net Metering”, is written from a North Eastern environment perspective where the peak need for electricity is in the winter, and where one of the white paper’s authors Barbara Alexander lives in Maine, concludes that the solar generated power does not coincide with the peak electricity demands. Whereas this may be true in the Northeast as well as other parts of the country, this is not true in Idaho. Exhibit 5 – “Rethinking Rationale for Net Metering” states solar “energy production is generally not coincident with peak demand of most utilities in the United States does not add value to the servicing power company”. The key word in the preceding sentence is a mighty big word “most”. Interestingly, in this same white paper an inset by Ashley Brown is ignored: “investment in centralized utility-scale solar could achieve the same environmental benefits at lower costs without cross subsidy”. Forward space to the present and we see utility-scale solar morphing to microgrids that will operate without the perceived cross-subsidy. It is very clear that consumer based solar energy can meet all the energy needs of all consumers, soon with or without IPC or any other utility.

A Solar electricity system is within the grasp of everyone now. Existing customers will transition from just solar panels systems then to solar panels and battery system (microgrid). Currently, enough battery capacity exists and better versions of batteries occur every few months.

There has been a tsunami of technology advance going on for some time, increasing in multifaceted capability and solar is just a small piece. The last issue of MSDN magazine November 2019 Vol 34 NO 11 explores “The Impact of Exponential Technologies” - article by Mark Michaelis provides some insight. This is real and not science fiction. Rampant unemployment is in the future because new technology requires new skills and education. This economic chaos is exacerbated by IPC-E-18-15 with great consequence. IPC collaborating with consumer based solar builds jobs or professions that have a future and builds a future for IPC. This is another way that customer based solar adds value for

IPC. Instead IPC fanatically resists any encroachment on its energy monopoly at any cost to the detriment of all its customer base.

Idaho Power itself states on their web site "Idaho Power is a summer peaking utility. The Company's highest demand is in the summer months". In Idaho (the very best solar power area in the United States and arguably, the world), the peak generation capabilities of solar coincide with the peak electricity demand periods.

IPC-E-17-13 states "Energy rates for R&SGS customers reflect not only the energy-related components of the revenue requirements, but fixed costs associated with generation, transmission, and distribution as well". It is true that Idaho Power has fixed costs as any business does. One of these fixed costs is the use of the Peaker plants needed at peak-demand times, (\$60,000,000 - newest natural gas Peaker plant at Mountain Home ID built 2006). The value of the excess customer generated solar electricity that is over and above consumption is worth far more than \$.11 kWh. Since this electricity is created at the exact time that the demand occurs, it takes up the surge usage demand on the grid caused by air conditioners etc. at no cost or intervention by Idaho power. The solar-generated power also obviates the need to use Peaker plants as Idaho Power can use this excess solar-generated power during peak demand periods. The Peaker systems rotating generators take a fair amount of time to come up to their production capacities, solar based systems respond synergistically. Nowhere in IPC -E-17-13 is any of this considered.

The customer-generated solar power adds value to the Idaho Power Company because this generation of excess electricity is at NO COST or intervention need by Idaho Power. It is simply "on" when peak demands occur. This statement is in stark contrast to Exhibit 5, which is used in the IPC-E-18-15 implied claim that solar-generated power adds no value. What is this called? Disinformation? Fake News?

IPC-E-18-15 will kneecap the Solar industry in Idaho for a while and will cause a whiplash during the inevitable Solar installations recovery from this decision because microgrids will go in on houses instead of just PV panels islanding IPC. A 10-15% drop in IPC consumers will decimate it. Public trust in IPC is pretty much gone. A charm school might have been a consideration but won't fix this. Buying a slicky customer-oriented user facing software package isn't a solution either (this is just PC). IPC's implacable business practices seem to come from a heritage that was born during the days of the Robber Barons or Captains of Industry. IPC was started in 1904.

Sic semper tyrannis. (UVA motto).

A large dispersed group of consumers based excess solar electricity producers would decrease risk of single point failure because the grid can't be defended. In Case No. IPC-E-06-09, Order No. 30201 "The Industrial Customers of Idaho Power (ICIP) argued the plant is not needed. ICIP said anticipated peak load deficiencies could be met if the Company were to acquire more power from small-power projects and implement more DSM (demand side management) programs." Please let us not make this same mistake again.

The current retail rate structure needs to be redesigned as it seems to exist only to obfuscate. A single page Enterprise Architecture (EA)map of the organization of the entire Idaho Power Company would be tremendous boon to both their employees, customers and investors. Transparency is a good thing and seems to be in short supply at Idaho Power Company. An Idaho Power Company single page map would aid in constructing a more realistic rate structure as the components of the organization can be viewed. I have found no evidence whatsoever yet of any kind of a real EA map in any of the documents reviewed, and the Idaho Power Company can't be run adequately without one. There is much more.

Summary:

This paper has shown that:

1. IPC collaborating with consumer based solar builds jobs or professions that have a future and builds a future for IPC.
2. Excess electricity from customer based solar systems or small power projects can be used by IPC during peak electricity needs obviating any investments (future and past) in Peaker plants.
3. Customer based solar reduces or eliminates risks from the vulnerabilities of the entire Grid because of decentralization.
4. Customer based solar energy provides a path from reliance on Nuclear energy and from inevitable catastrophic environmental destruction from processing and storage of spent Nuclear fuel.
5. Customer based solar energy generation is at no cost to the IPC and their consumers.
6. Customer based solar replacing peaker plants is a fundamental architectural change to IPC. This can be accomplished incrementally as more customers participate and become solar generating customers.