

Diane Holt

From: ilwerdna@gmail.com
Sent: Friday, November 29, 2019 9:17 PM
To: Diane Holt
Subject: Case Comment Form: Andrew Li

Name: Andrew Li
Case Number: IPC-E-18-15
Email: ilwerdna@gmail.com
Telephone: 5712257248
Address: 2301 W Hillway Dr
Boise ID Idaho, 83702

Name of Utility Company: Idaho Power

Comment: I'd recently invested in solar regeneration on my home to help reduce energy cost especially in the summer months. This was with the understanding that Idaho Power will honor the net metering policy for solar customers. However, they are now looking to profit from Idaho families and businesses by changing this policy. 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.

Regards,
Andrew Li

Unique Identifier: 164.165.206.42

Diane Holt

From: bodegaville@gmail.com
Sent: Friday, November 29, 2019 6:08 PM
To: Diane Holt
Subject: Case Comment Form: Gayle Chapman

Name: Gayle Chapman
Case Number: IPC-E-18-15
Email: bodegaville@gmail.com
Telephone: 2089727018
Address: 7854 W HUMMEL DR, 1099 S Wells St Meridian ID 83634
Boise ID, 83709

Name of Utility Company: Idaho Power Co

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. As a Solar customer since 2017, I would be extremely unhappy if my rooftop solar power that I generated did not have the same value and cost applied to it as any other type of power generated when I originally signed my agreement. Please protect me and others like me from being fleeced and defrauded of what I have paid for for my own well being. 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.

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Diane Holt

From: playingwithhobbes@gmail.com
Sent: Friday, November 29, 2019 4:35 PM
To: Diane Holt
Subject: Case Comment Form: Mike Sleger

Name: Mike Sleger
Case Number: IPC-E-18-15
Email: playingwithhobbes@gmail.com
Telephone:
Address: 9799 W. Shelborne Dr.
Boise ID, 83709

Name of Utility Company: Idaho Power

Comment: I spent a lot of money to have solar panels installed on my house with a full understanding of how it will affect my electricity bill year-round. It is unjust and wrong for Idaho Power to be proposing changes to the Net Metering program effecting reduced cost savings of the electricity being generated by existing customers. I would ask that you not allow Case Number IPC-E-18-15 to be approved.

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Diane Holt

From: mfriberg68@gmail.com
Sent: Friday, November 29, 2019 4:02 PM
To: Diane Holt
Subject: Case Comment Form: MERVYN FRIBERG

Name: MERVYN FRIBERG
Case Number: IPC-E-18-15
Email: mfriberg68@gmail.com
Telephone:
Address: 12585 S CARRIAGE HILL WAY
NAMPA ID, 83686

Name of Utility Company: IDAHO POWER
Comment: Mervyn & Linda Friberg 12585 S Carriage Hill Way Nampa, ID 83686

November 29, 2019
IDAHO PUBLIC UTILITIES COMMISSION
RE: Case Number IPC-E-18-15

We are distressed to hear Idaho Power is wanting to dismantle net metering. We have invested our retirement funds significantly in the purchase of our residential roof-top solar power system. Our decision to make this investment hinged on the net metering incentive feature of the solar system financial package. There is no way we would have made the decision to go with a solar power system without the net metering feature. We Idaho families and businesses should not be penalized for investing our 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.

Personally, our financial standing will be significantly crippled, should you allow Idaho Power to delete net metering for those of us who have already made this significant retirement investment.

Idaho Power should NOT be allowed to make a profit on the backs of unfairly treated solar customers. Again, it is ethically undefendable to now reverse that feature on families like ours who have already made significant investments, based primarily on the net metering incentives of Idaho Power.

You, as a Commission, should require that any request for a change to the net metering program be proceeded by a cost/benefit study performed by a neutral third-party to inform the Commission of the true costs and benefits of solar interconnection and to promote the growth of on-site power generation. If, after that study is completed and review, the Commission wants to allow the change, existing customers like ourselves should be allowed to keep agreements we 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. We hope you, the Commission, will recognize this and protect us from Idaho Power's discriminatory and unethical intentions. Please deny Idaho Power's proposal outright or at a minimum, make it a requirement to grandfather in existing customers like us who were incentivized by the net metering feature.

Thank you.

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Diane Holt

From: don.dutcher@gmail.com
Sent: Friday, November 29, 2019 3:50 PM
To: Diane Holt
Subject: Case Comment Form: Don Dutcher

Name: Don Dutcher
Case Number: IPC-E-18-15
Email: don.dutcher@gmail.com
Telephone: 2088537520
Address: 5821 W. Riverbend Lane
Boise Idaho, 83703-_____

Name of Utility Company: Retired -- volunteer for TESL, orphanages, teaching, construction, other (spk. Spanish, French, English)

Comment: Thank you for the opportunity to comment on possible rule changes for managing solar power through Idaho Power.

We have been solar power providers (residential) since about 2016. We produce more power than we consume so we are building up credits that we cannot use now or the near future. Auric Solar made a too-high estimate of our need, over-built, over-charged and they even projected costs to be recouped in 5-7 years, when, in actuality it would be over 21 years (I won't live that long!). They aren't interested in providing any rebates for the overbuilt nor fictional estimate of payback of the system!

But that's another issue, with Auric. I've simply asked them to remove all the positive publicity I gave them via video & in writing.

My request is simply to help us overproducers do something with our excess. My wife and I propose two things:

1. That the credits be applied to eliminate the \$5 IdPwr monthly administrative fee for getting a report of usage/production.
2. That we could be given the right to transfer credits to poorer individuals that might need help with their electric bill. We help the poor when we can; the Bible encourages that. And here's a resource that we have more than we need & would be glad to share. At any time that our needs escalated, we would have the ability to add or subtract the amounts we give, as well.

Perhaps the PUC has some other creative ideas for using "excess power production credits?" Your ideas and creative law-making would be greatly appreciated ... using the sun, being fair to providers & helping the poor .. if you have better ways/programs please implement them.

Thank you from those who have had no "say" in all this. May God give you wisdom, perseverance and grace in producing fair laws/practices/administration.

Don & Ann Dutcher
Boise, ID
don.dutcher@gmail.com

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Diane Holt

From: bevandmike@q.com
Sent: Friday, November 29, 2019 3:11 PM
To: Diane Holt
Subject: Case Comment Form: Mike Sheeley

Name: Mike Sheeley
Case Number: IPC-E-18-15
Email: bevandmike@q.com
Telephone: 2083426890
Address: 4119 W. Quail Ridge Dr
Boise ID, 83703

Name of Utility Company: Idaho Power
Comment: Members of the IPUC,

I am respectfully submitting these written comments in opposition to the pending Motion to Approve Settlement Agreement. As the owner of a small residential solar panel system, I oppose the proposed settlement agreement as follows:

Initially, I (and probably the overwhelming majority of similarly situated persons) was neither represented in the settlement discussions nor contacted to join any participating party. As such, I do not believe that my interests were adequately represented in that process. I believe that it is patently unfair to affect my property interests in a potentially adverse manner without, at a minimum, being given notice of the settlement process and the right to participate on some level. I previously filed a written comment in this pending case, but did not feel the need to become a party based upon the fact that the issue of compensation structure was to be determined in another docket. The people who actually made expenditures for alternative energy systems needed to be at the table. As subsequently discussed, no meaningful settlement discussions could take place in the absence of the comprehensive fixed cost analysis that the IPUC ordered Idaho Power to undertake regarding this matter.

On October 19, 2019, Idaho Power petitioned to initiate a docket (IPC-E-18-16) "to facilitate stakeholder input on . . . a comprehensive customer fixed-cost analysis". Idaho Power undertook that action based upon the IPUC's Order No. 34046 which found that such an analysis was required to determine the uniqueness of on-site generation customers as it affects cost, benefits, rates, and rate designs and, in addition, the matter of reasonable compensation for excess generation. Idaho Power has never undertaken that analysis and, apparently, seeks to avoid that undertaking by means of the proposed settlement agreement. Idaho Power needs to undertake that analysis as ordered by the IPUC in order to both make the germane information subject to the IPUC and stakeholder review and attempt to justify its proposed changes (perhaps Idaho Power would be willing to accept the results of the Brookings Institute's net metering study in lieu of conducting an additional analysis). I am perplexed as to how the parties to the settlement agreement could bargain in the absence of that information and how the IPUC could even consider a settlement agreement which lacked compliance with its order and the information it sought from Idaho Power. The absence of Idaho Power's compliance with the IPUC's order appears to be a denigration of the Commission's authority.

While I sincerely hope that the IPUC will deny the pending motion and require Idaho Power's analysis, it appears to be prudent to briefly discuss the substance of the settlement agreement. In pertinent part, the settlement agreement proposes both a transition from a monthly netting process to a "net hourly basis" and a reduction in the credited rate for on-site energy generation. The logical effect of these two changes will effectively reduce the value of my investment in my solar panel system by at least 50%. Net hourly metering will dramatically reduce the amount of electrical generation for which I will receive a credit. The effect of a reduction in credited rate is patently obvious. It becomes glaringly

apparent that the payback period for my solar investment will go from 17 to 20 years to some period of time beyond the useful life of my system. In addition, I asked the installer of my solar panel system if its configuration would have been engineered differently if installed in contemplation of a net hourly system. The installer assured me that the system would have been configured differently to maximize electrical production. In effect, Idaho Power seeks to significantly change the rules of the game after my investment had been made and my system installed. That is simply patently unfair. I, and many other on-site generators, relied on the availability of the monthly net metering system in order to make the decision as to whether the installation of solar panels was feasible.

Should the terms of the proposed settlement agreement become effective, the chilling effect on new on-site installations will be devastating. Without the possibility of a reasonable payback on investment, people will not make large expenditures in these systems. That means a loss of Idaho jobs in this industry. It also means that those of us who currently have systems may have difficulty obtaining warranty service after the installation companies have gone out of business.

I continue to ask myself how Idaho Power's course of conduct regarding on-site electrical generation squares with its espoused clean energy goals and initiatives. Unlike electrical companies in other states, Idaho Power does nothing to promote the installation of residential solar panel systems and, to my knowledge, has installed no charging stations to encourage the use of electric vehicles. While Idaho Power postures about reducing its reliance on coal burning power plants, it has gone out of its way to demonize those of us who actually installed clean energy systems. I sincerely hope that the IPUC will refrain from undertaking any action regarding on-site energy generation until it has sufficient credible factual information upon which to make an advised and informed decision.

Thank you for your consideration.

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Diane Holt

From: janet@buschert.com
Sent: Friday, November 29, 2019 10:28 PM
To: Diane Holt
Subject: Case Comment Form: Janet Buschert

Name: Janet Buschert
Case Number: IPC-E-18-15
Email: janet@buschert.com
Telephone: 208 830 6878
Address: 235 W Floating Feather Rd
Eagle Idaho, 83616

Name of Utility Company: Idaho Power Company

Comment: I am submitting these comments to ask for your vote to deny IPC-E-18-15. There are so many reasons to reject this settlement agreement that I cannot imagine another outcome. I will list just a few, but first I would like to tell you a little about my relationship to the monthly net metering program.

We have invested in two residential solar systems of approximately 10kw for our property. They serve our home, a rental home and two outbuildings. They were installed in 2014 and 2015. Those installations were done based on the Net Monthly Metering program. The systems were designed to match that program. One uses a dual inverter system and the other uses micro-inverters. If this program changes underneath us we will suffer significant financial loss and damage to the value of our property. These systems were carefully evaluated at the time of design and installation and the years to breakeven were within a range that was acceptable. The changes to net hourly meeting and the reduction in rate over time means we will never pay off our investment and our monthly bills will soar. Making a change like this will highlight the degree to which Idaho Power is an untrustworthy partner in any future programs they may develop. One reason I think you should obviously deny this agreement is that the proposal is premature because the "comprehensive study of the costs and benefits of on-site generation on Idaho Power's system" ordered by the PUC in Case No. IPC-E-17-13 has not been completed. And when complete those findings should be made available to the public, PUC and everyone with a net metering interest for careful review. I see no study data anywhere in this agreement or in other filings. If such a study does exist then it should be made public and highlighted so that we can personally analyze and comment on those results. Without such a study the contents of the Settlement Agreement are arbitrary and capricious. I gave none of the parties involved my permission to negotiate on my behalf. I also hear people say that the agreement "could have been worse". And some of the groups who I would have expected to better represent us in this effort have said that was the case. One data point mentioned was a comparison to a large-scale solar installation that was constructed at very low cost – lower than the amount arrived at in the Settlement Agreement, perhaps by half. But that installation was done with minimal need for supporting infrastructure to be installed. That is no comparison at all. And no basis for cost and benefit comparisons associated with residential solar.

Also, the Staff Comments in Favor of the Settlement call out some things that are worrisome and should be further studied before an agreement of any kind is reached. The possible negative impacts of Smart Inverters on current producers should be well understood, rather than just requiring that default settings originally be used. Do we absolutely know that default settings do no harm? And it's troubling to read that "Settlement discussions on how to calculate the avoided cost of Schedule 6 and Schedule 8 customers' exported energy deepened the realization among parties that there are currently several significantly different ways to calculate the avoided cost value for resources on the Company's system. Staff believes it is reasonable to investigate the possibility of a single avoided cost methodology that can be adjusted based on the specific attributes of each resource in order to more accurately and evenly value the resources on the Company's system." Fairness to us as customers should require that these issues all be run to ground before proceeding. The term "kangaroo court" is coming into focus.

Going in a slightly different direction, I read a lot in this agreements about “costs”, but I don’t read anything about revenues. So, in eight years from now I think it’s completely feasible that Idaho Power could be paying us 4.4 cents/kwh generated at peak times in the summer and sell that energy (in 8 years) out-of-state for over 20 cents/kwh. Where is the reward for us for the beneficial investment we’ve made in that scenario? And for our contribution to the grid? Idaho Power currently offers a dividend to shareholders of over 2 ½%. Where is the dividend to us for our contribution to their profitability and success?

Keeping on, from what I have read we are nowhere near the number of rooftop residential distributed systems to cause concern for “grid stability” or any other issues, and there are certainly not enough to be costing other customers on the grid measurable costs due to our claimed but questionable “favored status”. The most conservative reports I’ve read say that we could have three times the number of installations before any specific causes for concern, and I think at that point the statistical impact to other residents would still be miniscule. If they exist at all. Which harks back to the need for quality studies that can be reviewed by all.

Lastly, this entire movement is at odds with the stated values of Idaho Power. And because actions speak louder than words, I seriously question the commitment of Idaho Power to clean energy, fair treatment of customers and support of businesses in Idaho. I am quite confident they have an internal “game plan” that allows them to meet their goal of clean energy while not fulfilling the values they state. As a public company they have a profit motive and shareholders whose needs they must meet. And as the PUC I am counting on you to protect current and hopefully future rooftop residential solar customers along with all of the other customers of the company.

Pursuing clean energy goals as quickly and efficiently as possible would mean they would welcome 2-3x the number of residential distributed net metering systems they currently have (at least until there are real studies and data that say otherwise). Pursuing support of businesses in Idaho would mean that they wouldn’t seek to wipe out an entire class of businesses – solar system designers, installers and maintainers. Those installers, if they disappear, will be unavailable to maintain our systems. And then where will that leave us? This is just all wrong, and upside down thinking.

This Settlement agreement is premature, it's not fair, it's not reasonable and it's inconsistent with the values Idaho Powers professes. Please deny this Settlement Agreement and ask for complete studies that will help us arrive at a real solution.

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Diane Holt

From: ashlee.brain1@gmail.com
Sent: Friday, November 29, 2019 11:51 PM
To: Diane Holt
Subject: Case Comment Form: Ashlee Cornmesser

Name: Ashlee Cornmesser
Case Number:
Email: ashlee.brain1@gmail.com
Telephone:
Address: 660 Trini St
Kuna Idaho, 83634

Name of Utility Company: Idaho Power

Comment: I am upset about the change as I got solar because of the agreement that is between Idaho Power and Me. Things should not change because 1. Existing customers signed up under these conditions. They shouldn't be changed. If things do change, existing customers with solar should be grandfathered in.
2. Things shouldn't change at all because solar is a green energy source so this will make it where others won't want to make the switch that we need.

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