

Diane Holt

From: rjfehringer@gmail.com
Sent: Sunday, December 1, 2019 5:39 AM
To: Diane Holt
Subject: Case Comment Form: Richard Fehringer

Name: Richard Fehringer
Case Number: IPC-E-18-15
Email: rjfehringer@gmail.com
Telephone:
Address: 1352 Spring Court
Jerome IDAHO, 83338

Name of Utility Company: Idaho Power

Comment: I received your information in the mail about the possibility of a rate change for your customers that have installed solar power. I installed the panels solely on the premis of your current rates in hopes of getting my loan paid off by using that money I was using for power. If the rates are changed, I believe your customers that installed solar panels prior to the rate change should be grandfathered in under the current net meter standards. Please consider this very hard. Thank you, Richard (Rick) Fehringer.

Unique Identifier: 164.165.206.42

Diane Holt

From: justinwelty@gmail.com
Sent: Sunday, December 1, 2019 8:00 AM
To: Diane Holt
Subject: Case Comment Form: Justin Welty

Name: Justin Welty
Case Number: IPC-E-18-15
Email: justinwelty@gmail.com
Telephone: 2085593674
Address: 2309 W. Malad St.
Boise ID, 83705

Name of Utility Company: Idaho Power

Comment: We purchased solar panels over three years ago with the express purpose of offsetting our carbon emissions to help reduce our carbon footprint and to reduce our power bill in the long run. We were excited that we could afford the panels and have extra power we generate during peak times credited to our account and that power would be transferred to our neighbors providing local electricity. Being credited the normal rate was critical to our decision to purchase the panels. We are by no means rich, and getting full credit for all the extra power we generated was a critical factor in our decision to purchase the panels. Discovering the Idaho Power now wants to reduce our credit and essentially steal some of our electricity is infuriating. Forcing us to receive a reduced credit will force us to pay for both the solar panels and electricity. What made good financial and environmental sense in the long run suddenly seems like it will be an unwise investment all because Idaho Power wants to turn more of a profit and steal our electricity. I've used the term "steal" twice now because that is exactly what it is. We paid for the installation of the solar panels, we generate the electricity, and now Idaho Power wants to pay us a reduce rate and steal some of that electricity for free all so they can generate a profit.

Boise continues to grow at one of the fastest rates in the country. Power consumption is and will always be a major issue for any growing city. Rooftop solar is an excellent solution to this issue. Tens of thousands of roofs exist across Boise and the surrounding area. All literally doing nothing. Instead of creating huge solar farms that impact the surrounding environment, rooftop solar takes advantage of open spaces that already exist. Reducing our credit will decrease the likelihood that individuals will invest in rooftop solar. While this may help Idaho Power by allowing them to increase rates of those with rooftop solar, but it hurts everyone else in Boise. It will hurt consumers like myself as we will have to spend more money on electricity and less on everything else. It will hurt all the solar companies as individuals will invest less in rooftop solar. It will hurt the local economy as there will be reduced solar jobs and less cash in the pockets of those of us who do have solar. There are multiple reasons to allow those of us who generate our own electricity to be charge a fair and equal credit. There is only one reason to reduce our credit and that is to allow a greedy utility company to increase its profits.

I urge you to keep our credits at the going rate and do what is right for the citizens of Boise and not what generates the most profit for one company.

While I doubt our collective outrage will have any impact on your decisions, I urge you to put people over profit and to show that we value our environment and our local citizens who invest in solar.

Justin Welty

Unique Identifier: 164.165.206.42

Diane Holt

From: runkel1610@gmail.com
Sent: Sunday, December 1, 2019 8:27 AM
To: Diane Holt
Subject: Case Comment Form: Scott Runkel

Name: Scott Runkel
Case Number: IPC-E-18-15
Email: runkel1610@gmail.com
Telephone: 2087211737
Address: 1610 Northridge Dr
Hailey ID, 83333-8663

Name of Utility Company: Idaho Power

Comment: Dear Commissioners,

About five years ago I installed solar panels on the roof of my house in Hailey, making the decision in part due to the net metering agreement made with Idaho Power. Changing the deal now seems grossly unfair as my decision was made based on payback assuming full value for the energy I generate but can't use immediately.

Idaho should be incentivizing renewable energy as much as possible and this move certainly isn't going to do that. If it was a free market situation and my carrier changed the agreed-upon rules after a significant investment on my part, I would switch immediately to a new company. I don't have that option and am at the mercy of the PUC to recognize that this is patently unfair. I am encouraged by Idaho Power's commitment to clean energy and incentivizing residents to help achieve this goal makes sense. Let's have rules in place that do that.

Thank you,
Scott

Unique Identifier: 164.165.206.42

Diane Holt

From: hollopet@gmail.com
Sent: Sunday, December 1, 2019 9:28 AM
To: Diane Holt
Subject: Case Comment Form: Sarah Hollopeter

Name: Sarah Hollopeter
Case Number: IPC-E-18-15
Email: hollopet@gmail.com
Telephone: 2085596594
Address:
Boise ID, 83702

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

I am opposed to the proposed changes to net metering for solar customers brought forward by Idaho Power as part of case IPC-E-18-15. My principal objections are outlined below. Most disturbing to me and the public is that this change is based on a secret analysis performed behind closed doors that has not been made available to the public nor other third-party scrutiny. This violates principals of transparency and severely limits accountability moving forward.

The proposed changes will most likely eliminate the solar panel industry for residential customers in Idaho. Furthermore, it will drive current and future solar generating customers off of the power grid and Idaho power will lose customers.

Please take these points into consideration during your deliberations:

1. No net metering changes, or settlement proposals should take effect until the comprehensive study of the cost and benefits of on-site generation on Idaho Power's system, as was ordered by the PUC in Order No. 34046 Case No. IPC-E-17-13, has been completed, analyzed, and those findings evaluated by the public, PUC, and all parties with net metering interests, as stated in that docket.

- No study, nor any information related to a cost/benefit analysis study, was directly used to calculate the terms of this settlement decision.
- If a study was used to calculate these proposed changes, then that study should have been made available to the public and PUC for an opportunity to review before reaching the terms of this settlement or determining any other potential net metering changes.
- The proposed settlement is an arbitrary representation of parties who met behind closed doors without consulting the constituents who actually invested in on-site generation.
- All net metering interests were not taken into consideration during these settlement proceedings. In fact, the vast majority of net metering interests were not taken into consideration during these settlement proceedings. Order No. 34046 and Case No. IPC-E17-13 indicates that this case should include all net-metering interests in this study.
- Any changes to net metering should be evidenced based, and only then should we have a hearing about the whether net metering changes are properly justified.

- The current hearing is non-scientific, undemocratic, and should be postponed until a legitimate cost and benefit study has been properly conducted rather than completely ignored.

2. Grandfathering in existing net metering clients should be an obligation, not a consideration.

- No settlement should have taken place behind closed doors without the direct input of existing net metering customers.
- Systems were purchased and engineered based on existing net metering policies that track production and usage on a monthly basis.
- There were no other existing net metering models for the design of PV systems, or other types of on-site generation, at the time of this investment.
- The adoption of hourly net metering as proposed by the settlement would completely alter how existing systems would have otherwise been designed. This dramatically alters how these investments otherwise would have been made.
- In order to protect these investments, systems should be grandfathered along with the meter number attached to the residence and not only the account number of the client currently residing there. A calculated, expected increase in home value was a major factor in many solar investments.
- Any implemented changes that may happen should become effective 30 days from the PUC's decision and should not take place retroactively. This is a standard practice for most policy changes.

Sincerely,

Sarah Hollopeter

Unique Identifier: 164.165.206.42

- The current hearing is non-scientific, undemocratic, and should be postponed until a legitimate cost and benefit study has been properly conducted rather than completely ignored.

2. Grandfathering in existing net metering clients should be an obligation, not a consideration.

- No settlement should have taken place behind closed doors without the direct input of existing net metering customers.
- Systems were purchased and engineered based on existing net metering policies that track production and usage on a monthly basis.
- There were no other existing net metering models for the design of PV systems, or other types of on-site generation, at the time of this investment.
- The adoption of hourly net metering as proposed by the settlement would completely alter how existing systems would have otherwise been designed. This dramatically alters how these investments otherwise would have been made.
- In order to protect these investments, systems should be grandfathered along with the meter number attached to the residence and not only the account number of the client currently residing there. A calculated, expected increase in home value was a major factor in many solar investments.
- Any implemented changes that may happen should become effective 30 days from the PUC's decision and should not take place retroactively. This is a standard practice for most policy changes.

Sincerely,

Sarah Hollopeter

Unique Identifier: 164.165.206.42

Diane Holt

From: brianroberts52@gmail.com
Sent: Sunday, December 1, 2019 10:08 AM
To: Diane Holt
Subject: Case Comment Form: Brian Roberts

Name: Brian Roberts
Case Number: IPC-E-18-15
Email: brianroberts52@gmail.com
Telephone: 2089659980
Address: 240 E Mikyl Ridge Loop
Nampa Idaho, 83686

Name of Utility Company: Idaho Power

Comment: I added solar power to my home in August in a effort to save on my power bills as well as produce my own power. The current net metering system is an equitable way for consumers to reduce our cost in an equal portion to what we no longer require from the utility. We Are Not power producers. We did not set up our own solar system to sell power. We don't have the economies of scale on our side to offset the cost of what it took to install our own power production. As a consumer it's only fair to offset at an equal rate the power we produce. You can not allow Idaho Power to Not equitably offset our electricity usage at the same rate we purchase it. Compensating is for less than what we purchase our power is the utilities way of taking more power which they spent nothing for and to sell it at their profit. The power we consumers produce is not for profit of the power utility. It is for the benefit of us consumers to become more self reliant on our own efforts.

Idaho Power has no claim to sell the power consumers produce at their profit. Idaho Power can not buy our power during the day when we are not home to use it at half the cost, then turn around and sell us the power we produced at full rate. This is robbery.

Unique Identifier: 164.165.206.42

Diane Holt

From: dappel7@gmail.com
Sent: Sunday, December 1, 2019 11:05 AM
To: Diane Holt
Subject: Case Comment Form: Daniel Appel

Name: Daniel Appel
Case Number: IPC-E-18-15
Email: dappel7@gmail.com
Telephone: 208-941-4114
Address: 4190 N Waterford Pl
Boise ID, 83703

Name of Utility Company: Idaho Power

Comment: Nearly two years ago made a \$50,000 investment in a rooftop solar installation at my personal residence. This investment was made under the existing net metering system rules. I understood at that time that my investment in a solar power generation system would require approximately 12 years to recoup my investment (after federal Tax credit).

It is not fair for this proposed change to Idaho Power's reimbursement to solar power generators to be approved by the PUC.

In addition this reduced reimbursement rate will have a very negative effect on future solar installations in Idaho. I would not be opposed to a greater monthly flat fee for being part of the grid system.

Residential solar excess power generation during the peak summer demand times helps to reduce Idaho Power's need for purchasing additional power.

Thank you for your consideration

Unique Identifier: 164.165.206.42

Diane Holt

From: Sue99p@gmail.com
Sent: Sunday, December 1, 2019 11:09 AM
To: Diane Holt
Subject: Case Comment Form: Sandra Petersen

Name: Sandra Petersen
Case Number: IPC-E-18-15
Email: Sue99p@gmail.com
Telephone: 208 788 9647
Address: 731 northstar drive
Hailey Id, 83333

Name of Utility Company: Idaho Power

Comment: Please don't allow Idaho Power to change its net metering so that it penalizes those of us who have solar panels on our roofs, and discourages potential investment in solar power. Their claim to be 100% renewable by 2045 rings hollow.

Unique Identifier: 164.165.206.42

Diane Holt

From: bruce_sharon_skinner@q.com
Sent: Sunday, December 1, 2019 11:18 AM
To: Diane Holt
Subject: Case Comment Form: bruce skinner

Name: bruce skinner
Case Number:
Email: bruce_sharon_skinner@q.com
Telephone: 208-859-4689
Address: 16432 n midland blvd #36
nampa ID, 83687

Name of Utility Company: Idaho Power
Comment: Re: Change in rates for solar customers.

Havin gone solar a year and a half ago, we spent a lot of money under the existing rules and regulations. Now a proposed rule change that had we have known we might not have done the solar project. Its hard to play the game when the other team can change the rules at any given time.
Thanks for listening, be fair.

Sincerely,
Bruce Skinner

Unique Identifier: 164.165.206.42

Diane Holt

From: Twotpr@gmail.com
Sent: Sunday, December 1, 2019 11:46 AM
To: Diane Holt
Subject: Case Comment Form: Joe Corcoran

Name: Joe Corcoran
Case Number: IPC-E-18-15
Email: Twotpr@gmail.com
Telephone: 2088911104
Address: 4459 Danridge Ave
Kuna, ID Idaho, 83717

Name of Utility Company: 2 Thumbs Up Plumbing

Comment: We as a business aren't worried about the dollar for dollar issue. We as a business agreed to a solar installation for selling a watt for a watt . If for some reason Idaho Power is going to take our watt that we produced and resell it for a profit that's Idaho Powers business. However that's not what they are doing. Idaho Power is in fact saying that our watt we produce at our expense is not the same as the watt Idaho Power produces at our expense. That's not business that is criminal.

Unique Identifier: 164.165.206.42

Diane Holt

From: thumbsplumbing@hotmail.com
Sent: Sunday, December 1, 2019 12:04 PM
To: Diane Holt
Subject: Case Comment Form: Nolan Corcoran

Name: Nolan Corcoran
Case Number: IPC-E-18-15
Email: thumbsplumbing@hotmail.com
Telephone: 12088911104
Address: 4459 S. Danridge Ave
Boise Idaho, 83716

Name of Utility Company: Idaho Power
Comment: Money or not. We all should get a watt for a watt. IDAHO POWER shouldn't have the ability to dictate how much our watts are worth after Idaho Power agreed that our watts being the same.

Unique Identifier: 164.165.206.42

Diane Holt

From: thumbsplumbing@hotmail.com
Sent: Sunday, December 1, 2019 12:08 PM
To: Diane Holt
Subject: Case Comment Form: Nolan Corcoran

Name: Nolan Corcoran
Case Number: IPC-E-18-15
Email: thumbsplumbing@hotmail.com
Telephone: 12088911104
Address: 4459 S. Danridge Ave
Boise Idaho, 83716

Name of Utility Company: Idaho Power

Comment: Money or not. We all should get a watt for a watt. IDAHO POWER shouldn't have the ability to dictate how much our watts are worth after Idaho Power agreed that our watts being the same. Please send us a check for 25,000 dollars to the above address. If we are talking dollars please. If we are talking watts still. Please stick to the contract as mentioned.

Unique Identifier: 164.165.206.42

Diane Holt

From: padams@borealissolutions.com
Sent: Sunday, December 1, 2019 12:38 PM
To: Diane Holt
Subject: Case Comment Form: Peter Adams

Name: Peter Adams
Case Number: IPC-E-18-15
Email: padams@borealissolutions.com
Telephone:
Address: 2785 N. Lancaster Drive
Boise ID, 83702

Name of Utility Company: Idaho Power

Comment: As an owner of a rooftop solar system, I purchased and sized my system based on the net metering agreement that was in place at the time. It wasn't as good as in other states but good enough for us to go ahead and build it. I did this because I wanted to do my part to combat global climate change, and waiting for short term profit obsessed corporations to do the right thing wasn't going to get it done.

Idaho power moving to a rip-off rate structure for the surplus on my system during the day only to charge me full price when I use it at night is outrageous, and puts Idaho squarely on the wrong side of history on the single most important existential challenge we face. Not only should we NOT punish the providers of rooftop solar for doing the right thing, we should be working on legislation forcing the utility companies in Idaho to purchase all surplus wind or solar generated electricity at the end of the year. This kind of head in the sand climate change denial needs to turn around NOW. It's only going to get more expensive to reverse the damage of excess carbon the longer we wait.

If this change is allowed to happen, Idaho rooftop solar is going to wither and die, and those of us with existing systems are going to need to add expensive battery backup systems to avoid getting ripped off by Idaho power. Please don't let this happen.

Unique Identifier: 164.165.206.42

Diane Holt

From: joeskiv@cox.net
Sent: Sunday, December 1, 2019 1:44 PM
To: Diane Holt
Subject: Case Comment Form: Joseph Miczulski

Name: Joseph Miczulski
Case Number: IPC-E-18-15
Email: joeskiv@cox.net
Telephone: 2087212898
Address: 1141 Riverview Drive
Bellevue ID, 83313

Name of Utility Company: Idaho Power

Comment: My solar PV system was installed and put in service during May, 2016. I feel the Idaho PUC should uphold the original program that was agreed upon by Idaho Power and solar customers. I and many other Idahoans invested in self-installed clean energy expecting a fair deal.

Idaho families, including mine, and small businesses shouldn't have the rules changed on them after they have already made their investment.

The Idaho Power proposal could cost existing solar customers thousands of dollars on their electricity bills on top of the significant personal investment to purchase and install a solar system. Doing our part to protect my children's future on this planet shouldn't cost our family twice.

Allowing existing solar customers like my family 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, other utilities and commissions around the nation allow existing customers to keep the original terms, because it's unethical and unfair not to. The Idaho PUC should do the same for Idaho families and small businesses.

Maintaining existing utility rates and terms for existing customers is a very common practice for other utilities in the region making similar changes – Idahoan should be able to expect the same.

The Idaho PUC promised that discriminatory rates would not be the outcome of this proposed rate change. If changes are implemented that negatively impact my family's solar investment, it would be discriminatory. The PUC 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 Idaho Power had no intention of honoring the service agreement they set out initially, they shouldn't have even made it an option. But Idaho Power did, and it should be honored.

I'm proud my family was willing to make the financial sacrifice to purchase and install a solar PV system and do our part reducing carbon emissions. Please don't make our investment in our planet's and my son's future more expensive than it already was by changing the rules in the middle of the game.

Sincerely,
Joseph B. Miczulski

Unique Identifier: 164.165.206.42

Diane Holt

From: jstenuf@gmail.com
Sent: Sunday, December 1, 2019 1:58 PM
To: Diane Holt
Subject: Case Comment Form: JULIA MAHAFFEY

Name: JULIA MAHAFFEY
Case Number:
Email: jstenuf@gmail.com
Telephone: 2083830389
Address: 414 brookdale dr
Boise ID, 83712

Name of Utility Company: Idaho Power

Comment: ANY increase in fees and rates for solar net metering customers is unfair and short sighted. Solar is one of the ways customers can help Idaho Power and I do not understand why rates should increase for people trying to do the right thing for Boise energy needs. I do not have solar because of initial expense. Any move to make solar more expensive will encourage customers like me who are interested in solar turn away. I do not think this is the right direction for this public utility.

Sincerely,
Julia Mahaffey

Unique Identifier: 164.165.206.42

Diane Holt

From: tabber4@gmail.com
Sent: Sunday, December 1, 2019 2:11 PM
To: Diane Holt
Subject: Case Comment Form: Tabitha Thach

Name: Tabitha Thach
Case Number: E-18-15
Email: tabber4@gmail.com
Telephone: 8184818117
Address: 3893 S Suntree Way
Boise Idaho, 83706

Name of Utility Company: Idaho Power

Comment: We just got our solar panels and am really disappointed. In the very least, allowing existing solar customers to stay on the existing net metering program and applying the new program only to new customers is a good compromise that allows all parties to keep agreements made in good faith.

Thank you!

Unique Identifier: 164.165.206.42

Diane Holt

From: gcfrrnsn@gmail.com
Sent: Sunday, December 1, 2019 2:38 PM
To: Diane Holt
Subject: Case Comment Form: Curt and Gwen Fransen

Name: Curt and Gwen Fransen
Case Number: IPC-E-18-15
Email: gcfrrnsn@gmail.com
Telephone: 2086990610
Address: 3844 N. Willowbar Ln.
Garden City Idaho, 83815-7728

Name of Utility Company: Idaho Power

Comment:

We oppose the settlement proposed in this case.

First, we recall that the PUC determined that a "study" to assess both costs and benefits was necessary to assess and determine a fair rate schedule for customers with on-site generation (See Order No. 34046 in Case No. IPC-E-17-13). The settlement being proposed may be appropriate but without providing information (the 'study') which explains costs and benefits and how the settlement rate schedule was derived, there is no way for the public, to determine whether the proposed rate schedule is appropriate or not. The public should have access to, and it is the responsibility of the PUC and the involved parties to provide, adequate information as to the factors considered and utilized in determining the proposed settlement rate schedules. There are likely many factors and methodologies that were or could or should have been considered or utilized---but we have no way of knowing. It appears, reading between the lines, that the export credit rate was derived from and based only on "avoided cost" considerations. Some explanation is necessary as to why environmental and other public interests were not factored in some manner or even considered.

Second, the new schedules should not apply to existing customers with onsite generation. We invested in our modest roof-top solar system installed about 5 years ago after considering investment costs, tax credits and likely "pay-back" or "break-even" periods based on then existing and reasonably foreseeable rates. Because our home was relatively new and constructed to be extremely efficient, the "break-even" period was about 20 years. There is no way that we could have known that a radically different rate structure, one that decreases the value of customer generated energy by more than 50%, would ever be implemented. While we realized that rates could change, we reasonably believed, based on past PUC actions regarding rates, that any change would be modest and gradual---which 50% is not. Had we known, we likely would not have installed the system or we would have designed it differently--perhaps larger or incorporating other design features. Likewise, imposing the new rate structure on our existing on-site generation is unfair in that at the time the sytem was installed some design features that could have responded to or take into cosideration the proposed rate structure, simply didn't exist 5 years ago. This concern specifically applies to the proposed change from monthy net-metering to hourly net-metering. Existing customers which have invested in onsite generation such as ourselves should be grandfathered for the realistic life-expectancy of our systems, which is around 25 years.

Third, we strongly believe and suggest that the PUC should examine and implement strategies to encourage and harness the benefits of household solar systems for the public interest, including environmental factors. The public is willing, as were we, to invest in these systems, partly for the public good, if they make some sort of personal economic common sense. The current settlement proposal appears to remove most of that incentive. In a future where global warming threatens the availability of water for hydro power and the use of fossil fuels for turbines, solar and wind generation, including household systems will be important resource.

Thank you, Curt and Gwen Fransen

Unique Identifier: 164.165.206.42

Diane Holt

From: Ldfritze@msn.com
Sent: Sunday, December 1, 2019 2:57 PM
To: Diane Holt
Subject: Case Comment Form: Lance Fritze

Name: Lance Fritze
Case Number: IPC-E-18-15
Email: Ldfritze@msn.com
Telephone: 2084463536
Address: 195 E San Pedro Street
Meridian Idaho, 83646

Name of Utility Company: Idaho Power

Comment: I am opposed to the proposed rate change for net metering on Idaho Power's system.

We made a substantial investment to off set our power usage and now Idaho Power wants to change the rules that were agreed to. Those who already have systems installed should not be subjected to these proposed changes.

Idaho Power claims they need to make the proposed changes so that solar customers help pay for their infrastructure, such as substations, primary lines and transformers. I do believe all Idaho Power customers should help cover these charges, just not the way Idaho Power wants to do it. We currently do cover some of these charges with our Basic Charge on our monthly bill. When you look at Idaho Power's Bill Terminology list online, Basic Charge is defined by how it is arrived and then the last sentence explains, "The Basic Charge, billed on the basis of BLC, recovers a portion of the capacity-related costs of the distribution facilities, which includes substations, primary lines and transformers." Based on this definition all Idaho Power solar customers are currently paying for their infrastructure. If solar customers are not covering enough Idaho Power should be asking for a rate change regarding their Basic Charge, not their net metering.

When you look at Ida Corp's financial report you can see the parent company of Idaho Power is still in good financial health, which makes justification for this request hard to understand.

In summation those currently receiving 1:1 net metering should be grandfathered in, this is what we all based our decision on.

Solar customers are already paying a basic charge to offset infrastructure, if this needs adjusted this is what Idaho Power should be requesting, not taking half of our power credits. Finally Idaho Power wants to derive half of their Power from green power, this proposal will make sure it is not going to do that with homeowners help. Please deny this proposal.

Thank you,
Lance Fritze

Unique Identifier: 164.165.206.42

Diane Holt

From: Hknsanger@gmail.com
Sent: Sunday, December 1, 2019 3:00 PM
To: Diane Holt
Subject: Case Comment Form: Hannah Sanger

Name: Hannah Sanger
Case Number: IPC-E-18-15
Email: Hknsanger@gmail.com
Telephone: 2087056360
Address: 529 S 7th Ave
Pocatello ID, 83201

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

I urge you not to change the rate structure for residential users who generate solar power.

Thousands of Idahoans have already invested in residential solar systems, purchasing their system using a financial model that allowed them to invest their own funds and then slowly pay it off by generating solar energy for Idaho Power. Solar PV net metering reduces Idaho Power's generation needs at peak times when electricity is expensive to produce, as in the summer when air-conditioning requirements are high. The proposed rate structure change will penalize the ability of existing residential solar system owners to recoup their investment and will discourage future investments.

The solar PV industry in Idaho grew 43 percent from 2015 to 2016, and renewable energy and energy efficiency industries are creating jobs at 12 to 20 times that of the general economy. In Pocatello alone, over 90 residential rooftop structures were installed this past year. If the proposed rate structure goes into effect, fewer homeowners will be able to afford to install solar systems on their roofs, negatively impacting the solar job market.

Finally, I am sure that you are aware that similar rate changes have been considered by other state utilities. In every case, the legislatures and Utility Commissions have rejected the rate changes and kept net metering (see recent cases quoted below in Nevada, Montana, Wyoming). The Idaho PUC ought to do the same.

I urge you to keep the net metering rate as it is, and help spur the realization of residential solar's tremendous energy potential.

Sincerely,

Hannah Sanger
Residential Idaho Power customer

"In a vote of 5-0, the Montana Public Service Commission supported clean energy jobs and the right of Montanans to harness clean electricity from their own solar panels. The Commission rejected NorthWestern Energy's proposal to end net metering, implement a separate rate class, and impose punitive demand charge rates for rooftop solar customers." (November 26, 2019, Solar Power World).

[Wyoming] "Lawmakers introduced multiple bills to repeal or amend the state's net metering statute. But after more than four hours of impassioned public testimony Tuesday, two bills drafted to overhaul the state's net metering system

failed to advance to session. The Legislature's Joint Corporations, Elections and Political Subdivisions Committee voted 7-7, causing the bills to fail." (November 19, 2019, Casper Star Tribune).

"The Public Utilities Commission of Nevada (PUCN) unanimously approved a draft order on Friday that establishes new rules and regulations for how net-metered solar customers will be compensated in the state, bringing an end to nearly two years of policy debate.

"Sometimes the best way to move forward is to take a step back, adjust direction, and restart again," the order states. "That is what Nevada is doing with rooftop solar and net energy metering."

The decision comes after utility regulators voted to phase out net metering credits and hike fixed fees on all residential solar customers in December 2015.

The rate change undercut the economics of investing in home solar and slowed Nevada's booming rooftop solar market to a halt. Hundreds of solar workers were laid off and several installers pulled out of the state.

But with Friday's decision, Nevada's rooftop solar market is officially back in business, say rooftop solar advocates." (September 5, 2017, GTM)

Unique Identifier: 164.165.206.42

Diane Holt

From: rwoolery05@gmail.com
Sent: Sunday, December 1, 2019 3:06 PM
To: Diane Holt
Subject: Case Comment Form: Ric Woolery

Name: Ric Woolery
Case Number: lpc-e-18-15
Email: rwoolery05@gmail.com
Telephone:
Address: 16731 farmway rd
Caldwell Idaho, 83607

Name of Utility Company: Idaho Power

Comment: It amazes me that Id power is even attempting to under value those who have joined or want to join a growing community of people that are trying to improve power consumption. I've invested a large amount of money to aid in generation of power..Why would the PUC even think about letting this happen and push Idaho further into the dark ages.

Green power should be a huge goal for everyone and a single company should not be allowed to let this happen. Those that generate green power gain the benefit that Id Power established and now they want to change the rules for their gain alone. I've always thought that I was also a supportive producer in order to help others that struggle with income by helping to keep Idaho Powers need to buy power from other sources. How much power to they sell to others. How much do they buy from others?
Now they want to penalize US?
It will be a sad day if this is allowed to happen

Unique Identifier: 164.165.206.42

Diane Holt

From: sandrarman@msn.com
Sent: Sunday, December 1, 2019 3:06 PM
To: Diane Holt
Subject: Case Comment Form: Sandra Mansfield

Name: Sandra Mansfield
Case Number:
Email: sandrarman@msn.com
Telephone: 2083369174
Address: 3923 S Mt Vernon Way
Boise ID, 83706

Name of Utility Company: idaho power

Comment: I would like Idaho Power to honor their agreement with me concerning my solar system that I had put in. Idaho Power has no right to change the terms of said agreement. What Idaho Power does to future solar customers is up to them, just, leave the existing solar customers alone.

Unique Identifier: 164.165.206.42

Diane Holt

From: msanger123@gmail.com
Sent: Sunday, December 1, 2019 3:07 PM
To: Diane Holt
Subject: Case Comment Form: Matthew Sanger

Name: Matthew Sanger
Case Number: IPC-E-18-15
Email: msanger123@gmail.com
Telephone:
Address: 529 S 7th Av
Pocatello ID, 83201

Name of Utility Company: Idaho Power
Comment: December 1, 2019
RE: Case # IPC-E-18-15

Dear Members of the IPUC,

I am writing you to urge that you not change the net metering rate structure for residential users who generating solar power.

Many of us have invested heavily in residential solar systems, based upon existing net metering rates (which aren't that generous to begin with). Changing those rates is after a significant investment has been made is entirely unfair.

This will also be a setback for Idaho businesses who have invested in support small scale solar generation, because it makes their basis of their businesses economical unfeasible. You are knowingly working against Idaho jobs and small business success, and will have a chilling effect on future business investment, hurting our economy.

Next, like many others, my decision was based in part to help Idaho Power meet its OWN stated goals for renewable energy production. You claim to support clean sources of power generation, including solar, but your proposal punishes those of us working to support that stated goal (at our own expense). That is hypocritical.

A number of our neighboring states have faced similar situations, and made the right move to not punish their citizens for doing the right thing, and to support clean energy jobs and economic development in their states. I urge you to do likewise.

Sincerely,

Matt Sanger
529 S 7th Av Pocatello, ID. 83204

Unique Identifier: 164.165.206.42

Diane Holt

From: kpebertz@cox.net
Sent: Sunday, December 1, 2019 3:10 PM
To: Diane Holt
Subject: Case Comment Form: Kirk Ebertz

Name: Kirk Ebertz
Case Number: IPE-E-18-15
Email: kpebertz@cox.net
Telephone: 208 720 2454
Address: PO Box 1901
Ketchum ID, 83340

Name of Utility Company: Idaho Power

Comment: When I signed my net metering agreement with ID Power nothing was mentioned about the possibility of a rate change. We installed solar panels and agreed to the rules of the current net metering program. It is unfair to change them for existing customers that signed up for the current rates. The PUC has promised that discriminatory rates would not be an option. Breaking an agreement and changing rates for solar producers is discriminatory.

If ID Power wants to change the rates for solar producers they should make a new agreement with new customers and grandfather in current customers to the rates they agreed to.

Home solar panels are important in many ways and you should be doing all you can to support their use.

Thank you, Kirk Ebertz

Unique Identifier: 164.165.206.42

Diane Holt

From: geaton8@gmail.com
Sent: Sunday, December 1, 2019 3:14 PM
To: Diane Holt
Subject: Case Comment Form: Gayle Eaton

Name: Gayle Eaton
Case Number: IPC-E-18-15
Email: geaton8@gmail.com
Telephone: 208-315-4041
Address: POBox 752
Donnelly id, 83615

Name of Utility Company: Idaho Power

Comment: I bought solar panels 10 years ago. Due to the way that it is regulated, I have yet to see any positive results. It is also very difficult to see how much I generate. I think that Idaho Power should make it easier and profitable for those who do the responsible thing in this age of climate change. Do not approve this change. Thank you, Gayle Eaton

Unique Identifier: 164.165.206.42

Diane Holt

From: toddchavez4@gmail.com
Sent: Sunday, December 1, 2019 3:26 PM
To: Diane Holt
Subject: Case Comment Form: Todd Chavez

Name: Todd Chavez
Case Number: IPC-E-18-15
Email: toddchavez4@gmail.com
Telephone: 2088609025
Address: 17934 N Creag Way
Boise ID, 83714

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

I strongly urge you to reject Idaho Power's proposed change in net metering. We invested in solar power for our home as a solid action we could take to reduce our carbon footprint. We made the considerable investment based on the current net metering rates and, even at that, it will not be paid off for many years. It is not fair for Idaho Power to change the rules in the middle of the game. Furthermore, their proposed change in net metering goes against their stated goal to reach 100% clean energy production by 2045. Our society does not have time to delay the adoption of 100% clean energy production. Idaho Power should not be allowed to break their promises.

Thank you,

Sincerely, Todd Chavez

Unique Identifier: 164.165.206.42

Diane Holt

From: chuckdeeburnett@q.com
Sent: Sunday, December 1, 2019 3:50 PM
To: Diane Holt
Subject: Case Comment Form: Charles & Denise Burnett

Name: Charles & Denise Burnett
Case Number: IPC-E-18-15
Email: chuckdeeburnett@q.com
Telephone: 2088590063
Address: 25498 Emmett Road
Caldwell ID, 83607

Name of Utility Company: Idaho Power

Comment: We are against any changes to the current net metering. Idaho Power has not shared any cost/benefit study information that would justify the changes they suggest. We don't have hourly information for reimbursement changes suggested.

Grandfathering in these changes over 8 years is really just slowing down the changes. Grandfathering would mean no changes to current net metering customers.

As a solar generator in the Treasure Valley, our system adds power in the summer during peak needs which should be something that Idaho Power would want, yet these changes will discourage others from wanting to solarize their homes.

Unique Identifier: 164.165.206.42

Diane Holt

From: jennharr78@gmail.com
Sent: Sunday, December 1, 2019 4:04 PM
To: Diane Holt
Subject: Case Comment Form: Jennifer Harrington

Name: Jennifer Harrington
Case Number: IPC-E-18-15
Email: jennharr78@gmail.com
Telephone: 2084843676
Address: 6240 W. Butte Street
BOISE ID, 83704

Name of Utility Company: Idaho Power

Comment: I am submitting this comment in protest to Idaho Power's attempt to change the rules regarding how existing solar customers are paid for energy that they put into the energy grid. When I purchased my solar panels and signed up with this program it was with the understanding that I would get paid enough for the power I produced to cancel out my bill that I would normally pay to Idaho Power. In this way, I am able to take the money that I would have paid for electricity, and apply that to pay for my solar panels. I am low income and cannot afford to pay for both an electric bill and for my solar panels. When I signed up, I was given the impression that if there were ever changes to the contract with Idaho Power, that I would be grandfathered in at the original contract as an existing customer. It would be unfair and unethical for Idaho Power to go back on that now. Them paying me less of a credit than what I would be paying them for electricity is not what I agreed to. Please allow existing customers to keep the original contracts that they agreed to.

Unique Identifier: 164.165.206.42

Diane Holt

From: dewarsdodge@gmail.com
Sent: Sunday, December 1, 2019 4:54 PM
To: Diane Holt
Subject: Case Comment Form: Casey Campbell

Name: Casey Campbell
Case Number: IPC-E-18-15
Email: dewarsdodge@gmail.com
Telephone:
Address: 11504 W Peconic Ct, United States
Boise ID, 83709

Name of Utility Company: Idaho Power

Comment: Dear Public Utilities Commission, Idaho Powers desire to change the existing net-metering program for homeowners like myself is disappointing. In visiting Idaho Power's website, it indicates they are awaiting approval by IPUC to purchase 120MW power generation facility. This seems like a clear indication of the value that solar power brings to the communities that Idaho Power serves. I purchased a 6.9KW system in August 2018 and paid over \$30K to ensure I can help Idaho Power serve its customers as well as offset my usage. By allowing the change to the net metering program, it would allow Idaho Power to devalue my contribution to their Going Green by 2045 and making me pay more for electricity since it's the only game in town. Devaluing the homeowner's investments in green energy is not a long-term solution of their customers, just their investors.

Please reconsider any change to the existing net metering rules so that homeowners who have made the investment in green energy are not adversely affected. Allow existing customers to stay on the current net metering program and apply a new commonsense approach to new customers. I look forward to attending the meeting on December 3rd.

Sincerely,
Casey

Unique Identifier: 164.165.206.42

Diane Holt

From: kevinbrinegar@hotmail.com
Sent: Sunday, December 1, 2019 5:07 PM
To: Diane Holt
Subject: Case Comment Form: Kevin Brinegar

Name: Kevin Brinegar
Case Number: IPC-E-18-15
Email: kevinbrinegar@hotmail.com
Telephone: 2089723209
Address: 3414 W. Lassen St.
Boise ID, 83703

Name of Utility Company: Idaho Power

Comment: I would like to voice my concern over the proposed changes to solar and net metering policies by Idaho Power. I believe it is imperative that Idaho Power recognizes the value of solar energy as a model for future development in the state of Idaho and commits to working with communities that embrace it. Instead of prioritizing financial gains for the company, to compensate for the decreased customer dependence on the service, Idaho Power should work to adjust the number of FTE needed to continue operation under a new energy consumption dynamic. For customers that have already purchased solar because they were told that their monthly bill would be based on a consistent value/kwat, it is an insult to change the rules to limit this value. Not only will this rule-change affect future solar purchases, which speaks volumes to Idaho's lack of commitment to solar energy, but it will directly insult those that were excited to take the lead in moving Idaho in the right direction. By doing so, current solar households will think that Idaho Power is interested in only one thing...making money. Please do the right thing and respect customers that currently have solar, by not changing the current rate structure, and commit to adapting Idaho Power's culture to enhance and promote future households that recognize solar as an important part of Idaho's future and value.

Unique Identifier: 164.165.206.42

Diane Holt

From: hoops59@cableone.net
Sent: Sunday, December 1, 2019 4:52 PM
To: Diane Holt
Subject: Case Comment Form: Clinton Hoops

Name: Clinton Hoops
Case Number: IPC-E-18-15
Email: hoops59@cableone.net
Telephone: 2088707782
Address: 5914 W. View Dr.
Meridian Idaho, 83642

Name of Utility Company: Idaho Power

Comment: Thank you for the opportunity to comment on case number IPC-E-18-15.

As noted in item 1 of the motion to approve the settlement agreement, Case No. IPC-E-17-13, Idaho Power filed an Application with the Commission requesting the Commission: "4) Initiate a generic docket at the conclusion of IPC-E-17-13 to establish a compensation structure for customer-owned distributed energy resources ("DER") that reflects both the benefits and costs that DER interconnection brings to the electric system." Item 2 in the motion for approval of the settlement agreement refers to Order No. 34604. In order 34604 the Commission approved "the Company's request for a docket to study the costs, benefits, and related issues of net metering on the Company's system and to establish a compensation structure for DERs. The Commission encouraged the Company and interested stakeholders to work together to resolve the difficult issues inherent in designing a fair, just, and reasonable net metering program. The Settlement Agreement attached to this Motion as Attachment I results from the docket ordered by the Commission in Case No. IPC-E-17-13, and represents the culmination of the thorough, data-driven evaluation undertaken by the Company, Staff, and numerous stakeholders in a collaborative manner, as directed by the Commission."

As formulated, there are several major issues relating to the fairness of the program under the proposed settlement. The first relates to the general nature of the proposed program as it relates to existing and future customer generation facilities. This new proposed program drastically changes from the existing monthly net metering to an hourly net metering. This means that even though a customer produces an excess of power during the day overall, how that power is treated varies within the day. The proposed changes matter because my system and most other customer owned systems are designed to produce power based on peak conditions for generation not based on when our peak consumption occurs.

The second issue relates to the proposed rates under the settlement and ties back to the first issue. Under the proposed rates in the settlement agreement a system designed under the existing program has a payback period of approximately 15 years dependent on the discount rate applied. Under the new program after 2028 the same system has a payback period of over 30 years and may actually never pay back the initial investment when accounting for losses in system production and maintenance and repairs.

Third, under the new rate structure Idaho Power is allowed to capitalize the customers' investment in generation. In paying customers half of what they sell the power for, a system such as mine would generate 10s of thousands of dollars in income for Idaho Power without Idaho Power investing a cent.

In Idaho Power's motion, PUC order number 34604 is referenced approving a study of the costs, benefits, and related issues of net metering on the Company's system and to establish a compensation structure for DERs. No study has apparently been performed by Idaho Power as results of the study are not referenced nor are study results available for review by the PUC, Idaho Power customers or other parties with an interest in net metering. Without the comprehensive review proposed by Idaho Power a good cost/benefit analysis cannot be performed. This is reflected in

the settlement agreement by a number of locations such as Avoided Capacity and Avoided Line Losses, where the parties involved could not reach agreement and impacts are to be determined in future rate cases. I'll reference a study by The Brookings Institute which actually states that DER, specifically roof top solar, is beneficial to the utility, <https://www.brookings.edu/research/rooftop-solar-net-metering-is-a-net-benefit/>. Until a study has been performed and reviewed by all parties, evaluating all the costs and benefits of DER, this settlement is premature.

This agreement would also have a significant negative effect on the solar industry in Idaho, potentially causing several companies to abandon the Idaho market. This again reduces the value of the system as companies may not be available to repair the system or, if available, may charge more due to the reduced competition.

As noted in the agreement, grandfathering is not addressed. The changes in this program have a significant negative impact on existing net metering customers. The systems were designed and built based on the existing net metering rules and customers did not have any reason to build based on other criteria. Systems should be grandfathered, along with the meter number attached to the residence and not only the account number of the client currently residing there. An expected increase in home value was a factor in many solar investments. This protects the investment made by the customer, similar to how Idaho Power is treated.

The PUC has not held hearings regarding the existing net metering for these customers, nor have they been involved in any of the discussions regarding what a future program should look like.

As written the settlement agreement would take effect January 1, 2020 or on approval of the PUC. This is not an emergency rule and should only take effect after a reasonable time after approval. Should the agreement take effect, Idaho Power should not be allowed to delay approval of any pending net metering applications.

This settlement agreement also ignores many environmental and social impacts customer owned generation brings to the table such as reliance on coal and natural gas generation (which may in the future have additional benefits for Idaho Power), reduced reliance on hydro power and its impacts.

In conclusion, I feel the settlement agreement does not meet the requirements for a fair, just, and reasonable net metering program as the proposed program and associated rates paid for customer owned generation are unfair and a study has not been performed to address all the costs and benefits of customer owned generation. The only fair part of the settlement agreement is when customers owning generation are purchasing power, they are treated the same as all other customers in the rate class.

Unique Identifier: 164.165.206.42

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Unique Identifier: 164.165.206.42

Diane Holt

From: clblair3579@gmail.com
Sent: Sunday, December 1, 2019 5:16 PM
To: Diane Holt
Subject: Case Comment Form: Charles Blair

Name: Charles Blair
Case Number: IPC-E-18-15
Email: clblair3579@gmail.com
Telephone: 2083438028
Address: 4782 S Spotted Horse Ave
Boise ID, 83716

Name of Utility Company: Idaho Power

Comment: My wife and I have a rooftop solar system on our house. We are therefore quite interested in the proposed changes to the current net-metering system for Idaho Power customers. Our comments are divided into several sections for clarity. I begin with a summary of our main points and follow with details and extensive documentation supporting those main points. Each main point alone is enough reason for the PUC to deny the requested changes. Together, the arguments against these change cannot be ignored.

Summary of Key Points

Fairness

Idahoans have a strong belief that people should be treated fairly and not be penalized retroactively when the rules of the game change. We respect private investment by individuals, especially when that investment benefits others as well as benefitting ourselves, which is clearly the case with rooftop solar (as documented below). Existing residential solar generators must be grandfathered into the current net metering system and not subjected to the proposed unfair changes.

The Future of Residential Solar Under the Proposed Changes

Residential distributed solar installations in Nevada plummeted by 92% after that state's PUC implemented onerous changes to their net metering system. The changes proposed here will essentially kill any future expansion of residential and small commercial PV solar implementation in Idaho.

Proposed Changes Are Not Supported By Facts or Transparent Data

The cost/benefit study ordered by the PUC (Order No. 34046), which was to have provided information needed to develop a fair and equitable rate and reimbursement structure, has not been conducted. Without real data the proposed changes amount to nothing more than Idaho Power's assertions and "black box" calculations.

No net metering changes or settlement proposals should take effect until the comprehensive study of the cost and benefits of on-site generation on Idaho Power's system and other customers, as was ordered by the PUC in Order No. 34046 Case No. IPC-E-17-13, has been completed, analyzed, and those findings evaluated by the public, PUC, and all parties with net metering interests, as stated in that docket. Numerous studies have shown that the entire argument that costs are being shifted from those with rooftop solar to other customers has no basis in fact and there is no proof that it is happening in Idaho. Until we have the facts from the comprehensive study ordered by the PUC, any decision made at this time would be arbitrary and based on nothing more than Idaho Power's unsupported claims.

Residential Solar Cost/Benefit Analyses by Other State's PUCs and a DOE National Laboratory

Several other state's PUCs as well as the Lawrence Berkeley National Lab have conducted rigorous cost/benefit analyses of distributed solar. These studies concluded that the economic benefits of net metering actually outweigh the costs and impose no significant cost increase for non-solar customers. Far from a net cost, distributed solar systems and net metering are, in most cases, a net benefit for both the utility and for non-solar rate-payers.

A review of 11 net metering studies found that distributed solar offers net benefits to the entire electric grid through reduced capital investment costs, avoided energy costs, and reduced environmental compliance costs. Eight of the 11 studies found the value of solar energy to be higher than the average local residential retail electricity rate: The median value of solar power across all 11 studies was nearly 17 cents per unit, compared to the nation's average retail electricity rate of about 12 cents per unit.

Greenhouse Gas Emissions Are At Record Levels and Climate Change is Recognized as a Major Threat to National Security by the U.S. Military

The 2019 annual Emissions Gap Report by the UN Environment Program reported that total green house gas (GHG) emissions reached a record high of 55.3 Giga tons of CO2 in 2018.

Since January 2017, twenty-one senior officials at the U.S. Defense Department, including former defense secretary James Mattis, have publicly raised concerns about, and recommended actions to address, the security implications of climate change, both due to its effect on military infrastructure, readiness and operations, and its broader geostrategic implications for the United States.

In spite of these facts and the statements of grave concern about climate change by our top military leaders, IPC and the PUC are poised to implement these onerous changes, which will put an end to the growth of residential solar in Idaho. This would increase greenhouse gas emissions in Idaho rather than doing everything possible to reduce emissions.

Details and Documentation of Key Points

Fairness

Idahoans have a strong belief that people should be treated fairly and not be penalized retroactively when the rules of the game change. We respect private investment by individuals, especially when that investment benefits others as well as benefitting ourselves. We expect a system that is fair to all parties involved and we care about the kind of world we will leave to our children and grand children.

Idaho has a tradition of fostering independent businesses and individual choice. Rooftop solar is a great example of this, with local companies seeking to help individuals meet their own energy needs with competitive clean options.

My wife and I designed and built our system to primarily meet our own electrical needs as much as possible and we did so with a reasonable expectation of return on our investment. That fair return will not be possible under the proposed changes. Under the rules in place when we installed our system we expected a 10 or 11 year breakeven point. With this proposal that breakeven point is expected to more than double to over 20 years, assuming that further adverse changes are not implemented in the future.

Our system was sized and designed under the monthly accounting rules in place at the time. Our system would have been substantially smaller and the design would also have been much different if the proposed net hourly billing approach had been in place.

Again, changing the rules after the fact is hardly fair.

Residential Solar Cost/Benefit Analyses by Other State's PUCs and a DOE National Laboratory

Several other state's PUCs as well as the Lawrence Berkeley National Lab have conducted rigorous cost/benefit analyses of distributed solar. These studies concluded that the economic benefits of net metering actually outweigh the costs and impose no significant cost increase for non-solar customers. Far from a net cost, distributed solar systems and net metering are, in most cases, a net benefit for both the utility and for non-solar rate-payers.

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In spite of these facts and the statements of grave concern about climate change by our top military leaders, IPC and the PUC are poised to implement these onerous changes, which will put an end to the growth of residential solar in Idaho. This would increase greenhouse gas emissions in Idaho rather than doing everything possible to reduce emissions.

Details and Documentation of Key Points

Fairness

Idahoans have a strong belief that people should be treated fairly and not be penalized retroactively when the rules of the game change. We respect private investment by individuals, especially when that investment benefits others as well as benefitting ourselves. We expect a system that is fair to all parties involved and we care about the kind of world we will leave to our children and grand children.

Idaho has a tradition of fostering independent businesses and individual choice. Rooftop solar is a great example of this, with local companies seeking to help individuals meet their own energy needs with competitive clean options.

My wife and I designed and built our system to primarily meet our own electrical needs as much as possible and we did so with a reasonable expectation of return on our investment. That fair return will not be possible under the proposed changes. Under the rules in place when we installed our system we expected a 10 or 11 year breakeven point. With this proposal that breakeven point is expected to more than double to over 20 years, assuming that further adverse changes are not implemented in the future.

Our system was sized and designed under the monthly accounting rules in place at the time. Our system would have been substantially smaller and the design would also have been much different if the proposed net hourly billing approach had been in place.

Again, changing the rules after the fact is hardly fair.

Changing to net hourly billing means that IPC would get very cheap wholesale rate power from me when the sun is shining and will sell power back to me at the retail rate at other times of the day. How is this possibly fair?

Idaho Power has solar panels on its headquarters building and at several other of its facilities. They recognize the many positive aspects of solar and apparently believe that solar is good for them but not for individuals. That is unfair and we deserve better treatment from the utility who we have no choice but to work with and from the PUC.

The proposed changes to the pricing structure will kill future residential solar installations in Idaho. Effectively ending the expansion of residential small solar is totally inconsistent with Idaho Power's clean energy goals as stated on their own web site, "Idaho Power has set a goal to provide 100-percent clean energy by 2045. In addition to its hydropower facilities, which typically meet almost half its customers' energy demands, Idaho Power plans additional investments in wind, solar and other clean sources" (emphasis added).(<https://www.idahopower.com/news/idaho-power-sets-goal-for-100-percent-clean-energy-by-2045/>). Once again Idaho Power recognizes that solar is good for them and will be a part of their move away from fossil fuels but that distributed solar is not good for individuals. Please tell me how this is fair?

This unfair and unjustified attempt by Idaho Power to eliminate competition from the local solar industry also undercuts IPC's recent announcement to go 100% clean energy by 2045. To achieve this goal will require a wide variety of clean energy developments, including distributed energy systems where customers spend their own money to meet their own needs as well as contributing to the overall power grid.

Net metering makes sure that solar customers like myself, receive fair credit on their utility bills for the valuable, clean electricity we deliver to the grid. This individual investment in local solar power reduces the need for expensive utility infrastructure, lowers energy bills and supports local solar installation jobs. As described and fully documented in detail below, distributed rooftop solar has been shown in many states to provide a net financial benefit to regulated utilities and all of their customers.

Existing residential solar generators should be grandfathered in to the current net metering rate structure. In order to protect our investments, systems should be grandfathered along with the meter number attached to the residence and not only the account number of the client currently residing there. A calculated, expected increase in home value was a major factor in our solar investments and we should not be cheated out of the investment we made in our home's value. We installed our system based on the reimbursement rate in place at the time of installation and changing the rules now is completely unfair. The first word in Public Utility Commission is PUBLIC. We the public, with residential solar systems, are trying to do our part to generate clean power and reduce the rate of global warming. We should not be punished for doing so.

Order No. 34046 and Case No. IPC-E17-13 stipulate that this case should include all net-metering interests in a detailed and transparent cost/benefit study. All net metering interests were not included during these settlement proceedings. In fact, the vast majority of net metering customers, including my wife and me, were not included or apprised of developments, nor were we represented, during these settlement proceedings.

The PUC should allow existing residential solar customers to remain on the monthly net metering program until the thorough, transparent cost/benefit analysis ordered by the PUC is completed and available for review by the public.

The Future of Residential Solar Under the Proposed Changes

Case No. IPC-E-17-13 Order No. 34046 stated that "While the number of on-site generation customers on the Company's system is a relatively small percentage of the Company's total customers, based on the relatively high rate at which customers are installing systems in Idaho and elsewhere, we believe current and prospective on-site generators will be better positioned to analyze the costs and benefits of buying, installing, and maintaining an on-site generation system as a result of this Order."

This statement fairly indicates that any implemented changes in the current system would provide a baseline against which people could analyze the future costs and benefits of buying, installing, and maintaining an on-site generation system as a result of this Order. But what about the people who installed their system under the current rules? The approximate payback period under the current rules is 10 to 11 years. If the proposed changes are implemented that payback period would double to 20 to 22 years or more. It is doubtful that many people who currently have rooftop solar systems would have chosen to install those systems with a payback period of 20 to 22 or more years.

Case No. IPC-E-17-13 Order No. 34046 further states: "Though the number of net metering customers on Idaho Power's system is relatively small today – fewer than 1,500 net metering customers in June 2017, out of approximately 535,000 customers – the utility asserted that the increasing affordability of on-site generation would lead to surges in participation, exacerbating the shifting of costs from net metering customers to standard customers, and eventually killing the net metering program unless it is overhauled."

"The Commission agreed, saying "this inequity will only increase as more customers choose on-site generation" and that the outcome of this case will allow potential on-site generators access to reliable information on which to make a decision about whether to install on-site generation."

There is neither "reliable information" nor any proof that an inequity exists between rooftop solar customers and other IPC customers because the cost/benefit study ordered by the Commission has not been conducted. Furthermore, it is highly unlikely that there would be much additional rooftop solar capacity installed if the proposed changes are implemented. Here's one example of why future rooftop solar will die in Idaho under the proposed changes. In a number of states utility interests have sought to persuade state regulators to roll back net-metering provisions, arguing they are a net cost to the overall electricity system. The local utility in Nevada, NV Energy, successfully wielded a cost-shift theory (not unlike Idaho Power's argument) during the the last quarter of 2015 to get the Nevada Public Utilities Commission to drastically curtail the state's net-metering payments (http://pucweb1.state.nv.us/PDF/AxImages/DOCKETS_2015_THRU_PRESENT/2015-7/8305.pdf). The changes in Nevada resulted in a 92 percent decline in new residential solar installation permits in the first quarter of 2016 compared to Q4 2015, falling from 33 MW to 3 MW (Brookings Institute 2016 (<https://www.brookings.edu/research/rooftop-solar-net-metering-is-a-net-benefit/>)). As a result the state's three largest providers of rooftop panels (Solar City, Sunrun, and Vivint Solar) have left the Nevada market entirely. This is what we can expect to happen in Idaho as well if the proposed changes are implemented.

Proposed Changes Are Not Supported By Facts or Transparent Data

The cost/benefit study ordered by the PUC (Order No. 34046), which was to have provided this information, has not been conducted. Without real data or the "reliable information", as specified in the Order, the proposed changes amount to nothing more than Idaho Power's statements and "black box" calculations.

Net metering changes, or settlement proposals should NOT take effect until the comprehensive study of the cost and benefits of on-site distributed solar generation on Idaho Power's system, as was ordered by the PUC in Order No. 34046 Case No. IPC-E-17-13, has been completed, analyzed, and those findings evaluated by the public, PUC, and all parties with net metering interests, as stated in that docket. The basis of Idaho Power's proposed changes is that distributed power generators are not paying their fair share and that costs are being unfairly shifted to other rate payers. As thoroughly documented below, this premise has no basis in fact and there is no proof of it. The cost/benefit study ordered by the PUC (Order No. 34046), which was to have provided information necessary to make truly fair changes to the existing net metering system has not been conducted. Until we have all of the facts from the comprehensive cost/benefit study ordered by the PUC, any decision made at this time would be arbitrary.

I've monitored the output from my system and have observed that the peak output occurs during the summer and that the daily peak occurs between about 12 pm and 5 pm. Idaho Power's web site (<https://www.idahopower.com/news/idaho-power-sets-new-peak-demand-record/>) indicates that IPC recorded a new all-time peak demand on Friday, July 7, 2017. On that day, total demand reached 3,422 megawatts (MW) between 4

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I've monitored the output from my system and have observed that the peak output occurs during the summer and that the daily peak occurs between about 12 pm and 5 pm. Idaho Power's web site (<https://www.idahopower.com/news/idaho-power-sets-new-peak-demand-record/>) indicates that IPC recorded a new all-time peak demand on Friday, July 7, 2017. On that day, total demand reached 3,422 megawatts (MW) between 4

p.m. and 5 p.m. It appears that my peak generation, both seasonally and daily, roughly corresponds to peak demand periods on IPC. While I recognize that residential solar is a very minor contributor to IPC's total generation, small generators like myself help to meet peak demand, thereby reducing the need to purchase power on the open market or build more expensive generating capacity, both of which save money for all IPC customers. These factors must be fully considered and evaluated in an open and transparent process, as outlined in Order No. 34046, before the PUC makes any changes to the current net metering system.

The study specified in Order No. 34046 has not been undertaken. How can the PUC possibly set new terms and rates without the results of this study? I, and the rest of the interested public, expected to see these study results so that any structural or rate changes would be based on facts, and not just on IPC's preferences. The PUC is not doing its job when it allows a utility to dictate its own terms without any real data.

Residential Solar Cost/Benefit Analyses by Other State's PUCs

Detailed cost/benefit studies such as the one ordered by the PUC, have been conducted by the Public Utilities Commissions in several other states.

The Brookings Institute*, a highly respected, non-partisan research group founded in 1916, conducts research many areas related to economics and economic development. In 2015 and 2016 they undertook a study to answer the following questions that are at the center of this issue in Idaho. Those questions included: Does net metering really represent a net cost shift from solar-owning households to others? Or does it in fact contribute net benefits to the grid, utilities, and other ratepayer groups when all costs and benefits are factored in?

So what does the accumulating national literature on costs and benefits of net metering say? Increasingly it concludes—whether conducted by PUCs, national labs, or academics — that the economic benefits of net metering actually outweigh the costs and impose no significant cost increase for non-solar customers. Far from a net cost, net metering is in most cases a net benefit—for the utility and for non-solar rate-payers.

The following paragraphs in quotes, describing the results of these PUC-conducted studies, are taken directly from the Brookings Institute (2016) study (<https://www.brookings.edu/research/rooftop-solar-net-metering-is-a-net-benefit/>). "...by the end of 2015, regulators in at least 10 states had conducted studies to develop methodologies to value distributed generation and net metering, while other states conducted less formal inquiries, ranging from direct rate design or net-metering policy changes to general education of decisionmakers and the public (<https://nccleantech.ncsu.edu/wp-content/uploads/50sosQ4-FINAL.pdf>). And there is a degree of consensus. What do the commission-sponsored analyses show? A growing number show that net metering benefits all utility customers..." "In 2013 Vermont's Public Service Department conducted a study that concluded that "net-metered systems do not impose a significant net cost to ratepayers who are not net-metering participants." "The legislatively mandated analysis deemed the policy a successful component of the state's overall energy strategy that is cost effectively advancing Vermont's renewable energy goals." (<http://www.leg.state.vt.us/reports/2013ExternalReports/285580.pdf>)

"A 2014 study commissioned by the Mississippi Public Services Commission concluded that the benefits of implementing net metering for solar PV in Mississippi outweigh the costs in all but one scenario. The study found that distributed solar can help avoid significant infrastructure investments, take pressure off the state's oil and gas generation at peak demand times, and lower rates." (<https://www.synapse-energy.com/sites/default/files/Net%20Metering%20in%20Mississippi.pdf>)

"In 2014 Minnesota's Public Utility Commission approved a first-ever statewide "value of solar" methodology which affirmed that distributed solar generation is worth more than its retail price and concluded that net metering undervalues rooftop solar. The "value of solar" methodology is designed to capture the societal value of PV-generated electricity. The PUC found that the value of solar was at 14.5 cents per kilowatt hour (kWh)—which was 3 to 3.5 cents more per kilowatt than Xcel's retail rates—when other metrics such as the social cost of carbon, the avoided

construction of new power stations, and the displacement of more expensive power sources were factored in.” (<https://ilsr.org/wp-content/uploads/2014/04/MN-Value-of-Solar-from-ILSR.pdf>)

“Another study commissioned by the Maine Public Utility Commission in 2015 put a value of \$0.33 per kWh on energy generated by distributed solar, compared to the average retail price of \$0.13 per kWh — the rate at which electricity is sold to residential customers as well as the rate at which distributed solar is compensated. The study concludes that solar power provides a substantial public benefit because it reduces electricity prices due to the displacement of more expensive power sources, reduces air and climate pollution, reduces costs for the electric grid system, reduces the need to build more power plants to meet peak demand, stabilizes prices, and promotes energy security. These avoided costs represent a net benefit for non-solar ratepayers. (<https://www.nrcm.org/wp-content/uploads/2015/03/MPUCValueofSolarReport.pdf>)

These positive PUC conclusions about the benefits of net metering have been supported by research conducted by a national lab and several think tanks. Important lab research has examined how substantially higher adoption of distributed resources might look.

The Lawrence Berkeley National Lab, funded by the U.S. Department of Energy, is a world center for basic and applied research. Their stated mission is to “bring science solutions to the world. We are leaders in energy conservation. We find ways to save energy through design: better materials, greener buildings, and smarter power distribution.”

“In a forward-looking analysis of the financial impacts of net-metered energy on utilities and ratepayers, the Lawrence Berkeley National Lab found that while high use of net-metered solar generation may decrease utility shareholders’ earnings, it will have a “relatively modest” impact on ratepayers. The report examined solar penetration levels that are “substantially higher than [those that] exist today” — 10 percent compared to today’s 0.2 percent — and concluded that “even at penetration levels significantly higher than today, the impacts of customer-sited PV on average retail rates may be relatively modest.” The report further said that utilities and regulators “may have sufficient time to address concerns about the rate impacts of PV in a measured and deliberate manner” (https://emp.lbl.gov/sites/all/files/LBNL%20PV%20Business%20Models%20Report_no%20report%20number%20%28Sept%2025%20revision%29.pdfhttps://emp.lbl.gov/sites/all/files/LBNL%20PV%20Business%20Models%20Report_no%20report%20number%20%28Sept%2025%20revision%29.pdf).

“Similarly, a growing number of academic and think tank studies have found that solar energy is being undervalued and that it delivers benefits far beyond what solar customers are receiving in net-metering credits:”

“For instance, a review of 11 net metering studies by Environment America Research and Policy Center found that distributed solar offers net benefits to the entire electric grid through reduced capital investment costs, avoided energy costs, and reduced environmental compliance costs. Eight of the 11 studies found the value of solar energy to be higher than the average local residential retail electricity rate: The median value of solar power across all 11 studies was nearly 17 cents per unit, compared to the nation’s average retail electricity rate of about 12 cents per unit.” (https://environmentamerica.org/sites/environment/files/reports/EA_shiningrewards_print.pdf).

“Likewise, a study by the Acadia Center found the value of solar to exceed 22 cents per kWh of value for Massachusetts ratepayers through reduced energy and infrastructure costs, lower fuel prices, and lowering the cost of compliance with the Commonwealth’s greenhouse gas requirements. This value was estimated to exceed the retail rate provided through net metering.” (<https://acadiacenter.org/document/value-of-solar-massachusetts/>)

In short, while the specific conclusions vary, a significant body of cost-benefit research conducted by PUCs, a DOE National Lab, consultants, and research organizations provides substantial evidence that net metering is more often than not a net benefit to the utility and to all ratepayers.

Under Case No. IPC-E-17-13 Order No. 34046 the Idaho PUC, on May 9, 2018, “directed Idaho Power to initiate a comprehensive study of the costs and benefits of net metering on Idaho Power’s system. The Commission encouraged

construction of new power stations, and the displacement of more expensive power sources were factored in.” (<https://ilsr.org/wp-content/uploads/2014/04/MN-Value-of-Solar-from-ILSR.pdf>)

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Under Case No. IPC-E-17-13 Order No. 34046 the Idaho PUC, on May 9, 2018, “directed Idaho Power to initiate a comprehensive study of the costs and benefits of net metering on Idaho Power’s system. The Commission encouraged

the utility to collaborate with Commission staff and other stakeholders in conducting the study and determining proper rates, rate design, and compensation for excess generation for its net-metering customers. The Commission's order does not limit the scope of the study, intending to encourage creativity among the stakeholders and company in developing a successful net metering program.

That study has not been undertaken. How can the PUC possibly set new net-metering terms and rates without the results of this study? I, and the rest of the interested public, expected to see these study results so that any structural or rate changes would be based on facts, and not just on IPC's preferences and unsupported statements. The PUC is not doing it's job when it allows a utility to dictate it's own terms without any real data.

Greenhouse Gas Emissions Are At Record Levels and Climate Change is Recognized as a Threat to National Security by the U.S. Military

The 2019 annual Emissions Gap Report by the UN Environment Program reported that total green house gas (GHG) emissions reached a record high of Giga tons of CO₂ in 2018. The report further stated "There is no sign of GHG emissions peaking in the next few years; every year of postponed peaking means that deeper and faster cuts will be required to limiting global warming to below 2°C" (<https://www.unenvironment.org/resources/emissions-gap-report-2019>).

Since January 2017, twenty-one very senior officials at the U.S. Defense Department, including former Secretary of Defense James Mattis, have publicly raised concerns about, and recommended actions to address, the security implications of climate change, both due to its effect on military infrastructure, readiness and operations, and its broader geostrategic implications for the United States (<https://climateandsecurity.org/2019/02/16/update-chronology-of-u-s-military-statements-and-actions-on-climate-change-and-security-2017-2019/>).

In spite of these facts and the statements of grave concern about climate change by our top military leaders, IPC and the PUC appear poised to implement these onerous changes, which will put an end to the growth of residential solar in Idaho. This would likely increase greenhouse gas emissions in Idaho rather than doing everything possible to reduce emissions.

Footnotes

*The Brookings Institute's stated mission is to "provide innovative and practical recommendations that advance three broad goals: strengthen American democracy; foster the economic and social welfare, security and opportunity of all Americans; and secure a more open, safe, prosperous, and cooperative international system."

Brookings states that its staff "represent diverse points of view" and describes itself as non-partisan. Various media outlets have alternately described Brookings as conservative (Glaberson 2008), centrist (DeParle 2005), or liberal (Kurtzleben 2011). An academic analysis of Congressional records from 1993 to 2002 found that Brookings was referred to by conservative politicians almost as frequently as liberal politicians, earning a score of 53 on a 1–100 scale with 100 representing the most liberal score (Groseclose and Milyo 2005). The same study found Brookings to be the most frequently cited think tank by the U.S. media and politicians.

Additional References

Glaberson, William (November 16, 2008). "Closing Guantánamo may not be easy". The New York Times.

DeParle, Jason (June 14, 2005). "Next Generation of Conservatives (By the Dormful)]". The New York Times.

Kurtzleben, Danielle (March 3, 2011). "Think Tank Employees Tend to Support Democrats". U.S. News & World Report. Retrieved February 14, 2016.

Groseclose, Tim and Jeffery Milyo (2005). "A Measure of Media Bias". Pages 1191 – 1237 in: The Quarterly Journal of Economics, Vol 4, 2005.

Diane Holt

From: jody.brostrom@gmail.com
Sent: Sunday, December 1, 2019 6:29 PM
To: Diane Holt
Subject: Case Comment Form: Jody Brostrom

Name: Jody Brostrom
Case Number: IPC-E-18-15
Email: jody.brostrom@gmail.com
Telephone:
Address:
 Salmon Idaho, 83467

Name of Utility Company: Idaho Power Company

Comment: I am opposed to Idaho Power's proposed change in net metering. I installed rooftop solar on my home in Salmon, Idaho in 2014. At that time I entered into an agreement with Idaho Power that any energy I produced in excess of what I used would be credited to my account to be used at another time of the year. Idaho Power, and the Idaho Public Utilities Commission, should honor and uphold the original program that was agreed upon by Idaho Power and existing solar customers. I and others shouldn't have the rules changed after our investment in clean energy has been made, nor be subject to increases in their power bills. If Idaho Power feels that changes need to be made, then it should only be applicable to new customers, although this also penalized people interested in investing in clean power. Utilities and states around the country recognize that maintaining existing utility rates and terms for existing customers is ethical and reasonable. The same should be true 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. I expect the PUC to stand behind this promise. Support Idahoans who are investing in clean, renewable energy for the long term. Do not approve the changes in net metering for existing Idaho Power solar producing customers.

Unique Identifier: 164.165.206.42

Diane Holt

From: pearsonfarming@gmail.com
Sent: Sunday, December 1, 2019 6:49 PM
To: Diane Holt
Subject: Case Comment Form: Rick Pearson

Name: Rick Pearson
Case Number: lpc-e-18-15
Email: pearsonfarming@gmail.com
Telephone:
Address: 1705e 4000n
Buhl Id, 83316

Name of Utility Company: Idaho Power

Comment: I think Idaho Power's decision to cut rates after we have invested in a small solar system is completely unfair. They encourage green power we listened and helped, now they want to change the rules. They spend millions of dollars telling us how great they are, as if we have a choice since they are our only choice. If they want happy customers they must treat us fair. Please don't allow Idaho Power to kill the green energy movement. Thank you.

Unique Identifier: 164.165.206.42

Diane Holt

From: diannetiffany@q.com
Sent: Sunday, December 1, 2019 7:11 PM
To: Diane Holt
Subject: Case Comment Form: David Tiffany

Name: David Tiffany
Case Number: IPC-E-18-15
Email: diannetiffany@q.com
Telephone: 2082507116
Address: 9600 Cherry Lane
Nampa ID, 83687

Name of Utility Company: IDAHO POWER

Comment: I do not agree with Idaho Power's suggested rate decrease for solar power generators.

1. Generators provide power during the summer when Idaho power charges a higher rate to customers. During the winter months when we need power back we are actually using power that is at a cheaper rate. They are ahead right there.
2. Idaho Power vigorously advertises it is trying to help Idahoans to be more energy efficient and protect the environment. Yet it is essentially going to kill solar production. Just the opposite of what it claims it wants for Idaho. If Idaho Power talks the talk, then they should walk the walk!
3. If Idaho Power has to purchase power from another power company it does not dictate what the cost will be. It is what it is.
4. As solar energy producers we are not trying to make money, we are trying to reduce our costs and help the environment and help ease the dependence of Idaho from having to purchase power produced by outside the state and possibly from a source that is not as environmentally friendly.
5. I personally put in a solar system this year. I am 65 years old. At the current rate it will be 15 years before I save enough in power costs savings to pay for the system. I will probably never live to see it paid for if Idaho power has its way. Why would anyone commit the money for solar? I could of kept my 29k in a fund and made 5% a year. But I am hoping for a clean Idaho for my children/grandchildren and generations in the future.
The system I put in will at most provide 85% of my annual power consumption. Guess what I still have to purchase 15% more power to meet what I annually use.
I am sure other solar power generators do not produce 100% of what they use. So they also still will have to purchase Idaho Power electricity.
Idaho Power is making money off us.
I personally would rather see a slight increase in rates for all consumers if they feel they need more money.
I understand solar producers provide 3.52% of the states Power. Why should we be expected to lose our money and investment when all we are doing is trying to help the state and at best break even?

Yours Truly

David Tiffany
Solar Power producer

Nampa, Idaho

Unique Identifier: 164.165.206.42

Diane Holt

From: Paul@schlobohms.org
Sent: Sunday, December 1, 2019 7:47 PM
To: Diane Holt
Subject: Case Comment Form: Paul Schlobohm

Name: Paul Schlobohm
Case Number: IPC-E-18-15
Email: Paul@schlobohms.org
Telephone:
Address: 2357 E Parkside Drive
Boise Idaho , 83712

Name of Utility Company: Idaho Power

Comment: As a homeowner with a recently installed solar system on my roof, I have grave concerns about the proposed changes to net metering.

No settlement should have taken place behind closed doors without the direct input of existing net metering customers.

- Systems were purchased and engineered based on existing net metering policies that track production and usage on a monthly basis.
- There were no other existing net metering models for the design of PV systems, or other types of on-site generation, at the time of this investment.
- The adoption of hourly net metering as proposed by the settlement would completely alter how existing systems would have otherwise been designed. This dramatically alters how these investments otherwise would have been made.
- In order to protect these investments, systems should be grandfathered along with the meter number attached to the residence and not only the account number of the client currently residing there. A calculated, expected increase in home value was a major factor in many solar investments.
- Any implemented changes that may happen should become effective 30 days from the PUC's decision and should not take place retroactively. This is a standard practice for most policy changes.

Unique Identifier: 164.165.206.42

Diane Holt

From: jaredscow80@gmail.com
Sent: Sunday, December 1, 2019 8:07 PM
To: Diane Holt
Subject: Case Comment Form: Jared Scow

Name: Jared Scow
Case Number: IPC-E-18-15
Email: jaredscow80@gmail.com
Telephone: 2082372071
Address: 11706 N Nelson Lane
Pocatello Idaho, 83202

Name of Utility Company: Idaho Power

Comment: I am writing this to express my concern with the actions that may potentially be taken by Idaho Power. As an Idaho Power customer, who has invested in producing clean power, feel that it is improper for Idaho Power to change their agreement with those who have invested in solar power. Idaho Power should not be allowed to raise solar customer rates. Idaho Power should at minimum allow the net metering customers to be grandfathered in with the existing agreement. We installed our system under the current agreement, basing our return on that agreement. Changing the agreement would cause us a major financial burden. The commission promised that there would not be discriminatory rates that negatively impact the customers, yet this change that Idaho Power is proposing would do just that. This change would crush the solar industry in Idaho, making it difficult, if not impossible, for customers to go green or even desire to go green. I spent a considerable amount of money and time investing in a solar power system, and I would hope that the commission will take into account my concern and others like mine.

Sincerely,
Jared Scow

Unique Identifier: 164.165.206.42

Diane Holt

From: gpoorman54@gmail.com
Sent: Sunday, December 1, 2019 8:15 PM
To: Diane Holt
Subject: Case Comment Form: Gayle Buhrer-Poorman

Name: Gayle Buhrer-Poorman
Case Number: IPC-E-18-15
Email: gpoorman54@gmail.com
Telephone:
Address: 5230 N Black Cat Rd
Meridian ID, 83646

Name of Utility Company: Idaho Power

Comment: Dear Commissioners:

I would like to ask that you deny Idaho Power Company's request to change the residential solar reimbursement rate from 1:1 to 1/2:1 over the next five years. This change would, in my view, discourage development of solar installations that make use of one of Idaho's most abundant and free natural resources: sunshine! Idaho Power has pledged to move to 100% renewable resources to generate electricity by the year 2045. To meet this goal, it would seem to me that the use of rooftop solar would be of great benefit to the company. Rooftop solar does not require additional land, more miles of expensive transmission lines, and does not wipe out migratory wild fish runs like the hydro power dams do. With the rapid building of new homes in the ever expanding new subdivisions across the Treasure Valley, the time is ripe for such rooftop solar adaptations. But the proposed rate change would only provide disincentives to homeowners to install solar panels on their rooftops.

Climate change is upon us, and many companies across our country, and all over the world, are realizing the advantages of the inexpensive and ever-evolving efficiencies of photovoltaic solar power. It seems like an opportunity Idaho Power should embrace and encourage of its customers, rather than discourage through rate changes that disincentivize rooftop solar.

Thank you for listening to my concerns,
Gayle B. Poorman

Unique Identifier: 164.165.206.42

Diane Holt

From: spikeygg@gmail.com
Sent: Sunday, December 1, 2019 8:15 PM
To: Diane Holt
Subject: Case Comment Form: Greg Grotsky

Name: Greg Grotsky
Case Number: IPC-E-18-15
Email: spikeygg@gmail.com
Telephone: (208)917-7999
Address: 7682 W. Thunder Mountain Dr.
Boise Idaho, 83709

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

I recently received a letter from Idaho Power regarding changes to the net metering cost structure (<https://puc.idaho.gov/fileroom/cases/summary/IPCE1815.html> : IPC-E-18-15). I am shocked and dismayed by these measures. We purchased our solar array in June of 2019. Of course, a large factor in our purchase analysis was the ability to spread the upfront cost over the next 15-20 years with reasonable power rates over that period of time. This restructuring measure is well beyond an acceptable "adjustment" and forces my family to essentially eat the cost of the installation and equipment which was not something I had planned to do. If I had known this change was coming I would not have opted into the program. At this point, I have no choice--the array is purchased and installed. To anyone in my position, this feels very much like bait and switch, with no one supporting or representing those customers who made the solar switch in good faith. The PUC should uphold the original program that was agreed upon by Idaho Power and solar customers.

Rather than this hyper-active price gouge, it seems much more fair to offer a grandfather clause for early adopters, who should be allowed to keep their existing rates, while new adopters are introduced to the new plan. Allowing existing solar customers to stay on the existing net metering program and applying the new program to new customers is a common sense compromise that allows all parties to keep agreements that were made in good faith. Early adopters should not be penalized for investing in a program that was created to incentivize purchasing renewable energy generation. This bait and switch tactic is a terrible game to play with customers in the valley.

To approve a net metering policy which encourages investment for long term savings and to then completely invalidate it in this manner is unethical.

Thank you for your time,
-Greg

Unique Identifier: 164.165.206.42

Diane Holt

From: nullgee@gmail.com
Sent: Sunday, December 1, 2019 8:20 PM
To: Diane Holt
Subject: Case Comment Form: Rachael Grotsky

Name: Rachael Grotsky
Case Number: Case Number IPC-E-18-15
Email: nullgee@gmail.com
Telephone: 2089177999
Address: 7682 W. THUNDER MOUNTAIN DRIVE
BOISE ID, 83709

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

We recently received a letter from Idaho Power regarding changes to the net metering cost structure (<https://puc.idaho.gov/fileroom/cases/summary/IPCE1815.html> : IPC-E-18-15). We are shocked and dismayed by these measures. We purchased our solar array in June of 2019. Of course, a large factor in our purchase analysis was the ability to spread the upfront cost over the next 15-20 years with reasonable power rates over that period of time. This restructuring measure is well beyond an acceptable "adjustment" and forces our family to essentially eat the cost of the installation and equipment which was not something we had planned to do. If we had known this change was coming we would not have opted into the program. At this point, we have no choice--the array is purchased and installed. To anyone in our position, this feels very much like bait and switch, with no one supporting or representing those customers who made the solar commitment in good faith. The PUC should uphold the original program that was agreed upon by Idaho Power and solar customers.

Rather than this hyper-active price gouge, it seems much more fair to offer a grandfather clause for early adopters, who should be allowed to keep their existing rates, while new adopters are introduced to the new plan. Allowing existing solar customers to stay on the existing net metering program and applying the new program to new customers is a common sense compromise that allows all parties to keep agreements that were made in good faith. Early adopters should not be penalized for investing in a program that was created to incentivize purchasing renewable energy. This bait and switch tactic is a terrible game to play with customers in the valley.

To approve a net metering policy which encourages investment for long term savings and to then completely invalidate it in this manner is unethical.

Please let us know if there is anything more we can do as customers of Idaho Power to keep our existing (and agreed upon) net metering structure in place.

Unique Identifier: 164.165.206.42

Diane Holt

From: Linda_Engle@hotmail.com
Sent: Sunday, December 1, 2019 8:41 PM
To: Diane Holt
Subject: Case Comment Form: Linda Engle

Name: Linda Engle
Case Number: IPC-E-18-15
Email: Linda_Engle@hotmail.com
Telephone: 2084067633
Address: 340 S. 11th Ave
Pocatello ID, 83201

Name of Utility Company: Idaho Power

Comment: 1) Idaho Power (IPC) was supposed to do a study on the value of net-metering before changing rates. Where is that study?

2) How does lowering the price IPC pays for home generated electricity help IPC move toward 100% renewable?

3) This rate change suppresses a potential jobs increase and economic boom that other states have experienced with residential solar power.

4) It's clear IDP does not want solar, but the public wants it. Last summer, with Solarize Pocatello, we saw over 375 people in SE Idaho were interested. Close to 90 homeowners put solar panels on their property through that program. We are talking multi-millions of dollars.

5) How can IPC possibly know the value of solar in eight years? They don't even know what their own prices will be in eight years. What is the process they are using to value solar energy? (see question #1)

6) Keep in mind what is happening in neighboring states: On November 19 the Wyoming Tribune Eagle reported that two Wyoming net-metering bills were rejected. The bills would have effectively killed the solar industry in Wyoming. https://www.wyomingnews.com/.../article_7f4cc8a4-de90.

On November 25, the Montana Public Service Commission voted 5-to-0 against a proposal to add a charge onto new rooftop solar. <https://tinyurl.com/s2epazl>

Thank-you for your time.
Please do not approve this rate change.

Unique Identifier: 164.165.206.42

Diane Holt

From: jvandinter@centurylink.net
Sent: Sunday, December 1, 2019 8:53 PM
To: Diane Holt
Subject: Case Comment Form: James Van Dinter

Name: James Van Dinter
Case Number: IPC-E-18-15
Email: jvandinter@centurylink.net
Telephone: 2082978288
Address: 12088 W Tidewater Dr
Boise ID, 83713

Name of Utility Company: Idaho Power Company

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. The over 5,000 solar customers have invested over 75 million dollars (\$15,000 per customer). 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. Thus 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 incentivise 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.

At the last public hearing there was general agreement that a complete study of the impact of private solar systems on Idaho was needed. The Brookings Institute report "Rooftop Solar: Net metering is a net benefit" (May 23, 2016) cites a number of studies by other states that conclude that the present system of net metering is a benefit to the local power company. Is this what Idaho Power is afraid of? Does the company want to avoid a conclusion they do not profit by.

We are not asking for a rate increase to pay us for the 75 million dollars plus that we have invested in expanding the power generating resources for Idaho Power. We are asking to be treated fairly and according to the contract many of us signed with Idaho Power. We are also asking that new families be treated the same as us. Please do not act before the solar utilization study is completed. And do not allow Idaho Power to use the PUC as a means to modify the contract we have with the company.

James A Van Dinter
12088 W Tidewater Dr
Boise, ID 83713
208 297-8288
jvandinter@centurylink.net

Diane Holt

From: missed@cableone.net
Sent: Sunday, December 1, 2019 8:59 PM
To: Diane Holt
Subject: Case Comment Form: Edith Bregitzer

Name: Edith Bregitzer
Case Number: IPC-E-18-15
Email: missed@cableone.net
Telephone: 208 251-1665
Address: 408 Polk Street
American Falls Idaho, 83211

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

As a native Idahoan, I value the clean air and beautiful landscapes we enjoy in this state. Going solar was one way for my husband and I to help protect the environment with a renewable energy source. Now, Idaho Power wants to decrease the value of credit that solar customers receive on their bills for excess electricity to a rate that is approximately 50% less than it is today. I feel strongly that the proposed rate decrease will precipitously slow down the adoption of clean energy in Idaho and have lasting negative impact on the environment and the economy.

Idaho Power wants to achieve a goal as a 100% renewable energy provider by 2045. Solar power customers are helping Idaho Power to achieve this goal. Changing the rules at this time will negatively impact the drive for other customers to want to go with solar energy as a renewable energy source. As an Idaho Power customer and a rooftop solar panel customer, I strongly urge the Commission NOT to approve the proposed decrease value of credit solar panel customers receive on their bill for the electricity returned to the grid.

Respectfully,
Edith Bregitzer
408 Polk Street
American Falls, Idaho

Unique Identifier: 164.165.206.42

Diane Holt

From: rtcblc@gmail.com
Sent: Sunday, December 1, 2019 10:00 PM
To: Diane Holt
Subject: Case Comment Form: Ray and Beth Corbin

Name: Ray and Beth Corbin
Case Number: IPC-E-18-15
Email: rtcblc@gmail.com
Telephone: 530-251-6165
Address: 6578 Cross View Lane
Marsing ID, 83639

Name of Utility Company: Idaho Power

Comment: As residential solar power providers for 5 years, we are concerned by the new proposed rate structure the commission is studying. Our concerns focus on several areas.

1) Unfairness, as it fundamentally and radically changes the rate structure that was in place when we started. This change is unfair, unsupported, and unethical for a utility monopoly such as Idaho Power to propose. This also negatively affects estimated payback times by a substantial period.

2) At a time when Idaho Power is touting its environmental commitment to clean and sustainable energy production, this proposal is a disincentive to customers who willingly invest in a system that helps with their stated goals. This is further demonstrated by Idaho Power's own Residential and Business Solar Program which puts their program in competition with existing residential producers.

3) We produce power during peak periods of electric need at no increased cost to Idaho Power. By having peak power available, Idaho Power saves investments in alternative sources of power needed during peak periods without investing Idaho Power's (publics funds) for these sources.

We believe the rate structure should remain as it is. If anything, Idaho Power should recognize and promote residential solar production by increasing the residential net metering rate, not lower it. If the commission insists on a higher rate for net metering customers, it should only affect new customers and grandfather existing residential net metering customers.

Unique Identifier: 164.165.206.42

Diane Holt

From: patrickandamyjo@gmail.com
Sent: Sunday, December 1, 2019 10:05 PM
To: Diane Holt
Subject: Case Comment Form: Patrick Frederickson

Name: Patrick Frederickson
Case Number: IPC-E-18-15
Email: patrickandamyjo@gmail.com
Telephone: 208-513-5084
Address: 3004 E Rosso Place
Caldwell Idaho, 83605

Name of Utility Company: Idaho Power Company

Comment: In opposition to Changing Compensation of Net excess energy supplied by customer on-site generation.

I have signed 290 individual on a petition that have agreed with my view for the opposition of the change.

Reasons for opposition:

- 1) Customers current structure is fair with excess of energy being a credit for power being used at equal prices.
- 2) Customers have incurred all of the cost of the panels without compensation from the energy company. This change will severely negate the cost benefits to those with solar.
- 3) Currently customers pay the \$5.00 fee and have additional power bills during sub optimal solar days such as much of the winter.
- 4) The Solar companies are providing the necessary upgrades to the neighborhood power systems to allow solar panels, the consumers are paying for upgraded monitoring systems. Idaho Power has not provided any physical upgrades or cost for consumers wanting to go solar. What has changed recently for them to determine that solar is such a threat to a booming area where power usage will be a hot topic for years to come.

Thank you for you consideration of several concerned users that will be directly impacted negatively for your decision.

The petition mentioned can be emailed upon request of found at <http://chnng.it/zRc6BVvM>

Thank you,
Patrick Frederickson

Unique Identifier: 164.165.206.42

Diane Holt

From: mjw.pra4snow@gmail.com
Sent: Sunday, December 1, 2019 10:05 PM
To: Diane Holt
Subject: Case Comment Form: Michael Wissenbach

Name: Michael Wissenbach
Case Number: IPC-E-18-15
Email: mjw.pra4snow@gmail.com
Telephone: 2083083870
Address: 280 May Road
McCall ID, 83638

Name of Utility Company: Idaho Power
Comment: Proposed Idaho Power Changes to On-Site Generators

Idaho Public Utilities Commission:

We are writing to oppose Idaho Power's proposed changes to the way it compensates customers who export energy to Idaho Power's electrical system using their own on-site generation. We applaud Idaho Power for setting a goal to provide 100% renewable energy to all customers by 2045. Customers like us, with on-site generation can play an important role in helping achieve that goal. However, reducing by 50% the rate at which we are compensated for producing energy for the system undermines that very commitment.

When we made the substantial investment in our photovoltaic solar system, we analyzed how long it would take to recoup our initial investment based on the monthly net-metering of how much our system would generate versus how much energy we would consume. To have the compensation rate slashed in half puts us underwater for many years to come.

Customer-generated solar systems, such as ours, produce more excess energy when Idaho Power needs it the most – during hot summer days when energy demands on the system are at their peak. This customer-generated energy supplied to the grid can be efficiently used in the local area without incurring transmission energy loss and expense, a win-win situation for Idaho Power and customers, alike. Idaho Power's proposed hourly net-metering discounts this energy supplied when it benefits Idaho Power more than it does the producing customers. This is not right.

We believe that the Idaho PUC should uphold the existing monthly net-metering program that was agreed upon by Idaho Power and on-site generator customers. This program served as an incentive to develop and utilize locally generated renewable energy and to encourage investment for long-term savings. We urge the Idaho PUC to deny Idaho Power's proposed changes to on-site generators.

Michael & Pam Wissenbach
280 May Road
McCall, Idaho 83638

Unique Identifier: 164.165.206.42

Diane Holt

From: rogarst@gmail.com
Sent: Sunday, December 1, 2019 6:33 PM
To: Diane Holt
Subject: Case Comment Form: Roger Turner

Name: Roger Turner
Case Number: IPC-E-18-15, IPC-E-18-16, IPC-E-19-15
Email: rogarst@gmail.com
Telephone: 2084069658
Address: 307 N. Buchanan Ave.
Pocatello Idaho, 83204

Name of Utility Company: Idaho Power Company
Comment: November 29, 2019

Idaho Public Utility Commission (IPUC)
Commission Secretary
P.O. Box 83720
Boise, Idaho 83720

Re: Comments on Solar Net-Metering Rate Change proposed by Idaho Power; IPC-E-18-15, IPC-E-18-16, IPC-E-19-15

Dear Commissioners:

Thank-you for this opportunity to comment on Idaho Power Company's (IPC) proposed compensation rate increase to Net-Metering customers

I urge the IPUC commission to deny the rate change for the following reasons:

(1) Lower Compensation Rates Would Effectively Stop Roof-Top-Solar in the State. The IPUC should deny the reduced compensation rate because it will make residential Net-Metering unreasonable financially, due to the additional years needed to pay off the cost of the investment. That is: the proposed decreased compensation will almost completely suppress interest in residential solar power generation in Idaho Power Company's service area. It would significantly reduce the power added to the grid that would otherwise benefit IPC's customers.

Idaho Power reports in the media that they support solar programs. For example their newsletter "Connections" states that Solar "strengthens the electrical grid." Thus Idaho Power, on the one hand advertises support for solar initiatives, but with this proposal they would significantly reduce compensation rates in a manner that would almost completely stop future homeowner Net-Metering. The IPUC should consider this contradiction when making their decision because it is unjust and unreasonable, per IPUC's guidance outlined by the state.

(2) Homeowners Bear the Cost of Solar. Since the homeowner pays for the design, equipment and installation of Net-Metering there is little or no costs to Idaho Power for Net-Metering. (I tried to find the cost analysis presented by Idaho Power for this case and could not find one on IPUC's website.) Solar Net-Metering is nothing but a gain added to the power grid.

Idaho Power already has a fail-safe profit system: If the solar power delivered to the company does not equal the customers usage, the solar customers are charged the retail rate for the difference; but if that Net Metering system

adds more power to the grid than they use every year it is just captured by Idaho Power for absorption into the grid without providing any compensation to the home-owner. Also, Idaho Power charges all Net Metering customers enough to pay the administrative costs (\$62.28/year). It's already a win-win scenario for Idaho Power, without any change to the rates. In all fairness and prudence the compensation rate should stay the same as the retail rate.

(3) Idaho Power's Proposed Compensation Rate is Contrary to the IPUC Guidelines. Reducing Net Metering incentives, as proposed by Idaho Power surely isn't in the interest of Idaho citizens, nor does it adhere to IPUCs guidance in such matters: That is, under state law the IPUC shall regulate utilities "assuring adequate service and affixing just, reasonable and sufficient costs". The proposed cutting of the compensation rate by nearly half is an extreme one that is not "Just", not "Reasonable" and does not demonstrate "Sufficient Costs".

(4) Existing Net Metering Customers Should be Exempt If The Compensation Rate is Reduced. What about those homeowners that installed a system under the existing compensation rate? The IPUC should not penalize those that have installed Net-Metering, in good faith, if there is any compensation rate reduction.

In our case, we researched the cost, calculated the panel number in order to add enough power to the grid equal to our usage, and decided to invest in a system-based on the existing compensation rate. We also installed a "smart Inverter" recommended by Idaho Power to assist them in a smooth absorption of our energy into their system. We have paid our power bills of \$5.19/month that goes to IPC's costs of adapting our imported power and administrative costs. Had we known that the compensation rate would have been reduced we would have never installed the system. This situation is true for most existing Net Metering customers. It's not right to change the rates now. Hence, I urge IPUC to exempt existing Net Metering customers from any rate change approved for the future. This would be the fair thing to do.

Roger & Kaye Turner
307 N. Buchanan Ave.
Pocatello, ID 83204

Unique Identifier: 164.165.206.42

adds more power to the grid than they use every year it is just captured by Idaho Power for absorption into the grid without providing any compensation to the home-owner. Also, Idaho Power charges all Net Metering customers enough to pay the administrative costs (\$62.28/year). It's already a win-win scenario for Idaho Power, without any change to the rates. In all fairness and prudence the compensation rate should stay the same as the retail rate.

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In our case, we researched the cost, calculated the panel number in order to add enough power to the grid equal to our usage, and decided to invest in a system-based on the existing compensation rate. We also installed a "smart Inverter" recommended by Idaho Power to assist them in a smooth absorption of our energy into their system. We have paid our power bills of \$5.19/month that goes to IPC's costs of adapting our imported power and administrative costs. Had we known that the compensation rate would have been reduced we would have never installed the system. This situation is true for most existing Net Metering customers. It's not right to change the rates now. Hence, I urge IPUC to exempt existing Net Metering customers from any rate change approved for the future. This would be the fair thing to do.

Roger & Kaye Turner
307 N. Buchanan Ave.
Pocatello, ID 83204

Unique Identifier: 164.165.206.42

Diane Holt

From: bb_brooks33@msn.com
Sent: Sunday, December 1, 2019 10:42 PM
To: Diane Holt
Subject: Case Comment Form: Brian Brooks

Name: Brian Brooks
Case Number: IPC-E-18-15
Email: bb_brooks33@msn.com
Telephone:
Address: 419 Elk Creek Road
Idaho City Idaho, 83631

Name of Utility Company: Idaho Power

Comment: To: PUC

December 1, 2019

From: Brian and Becky Brooks

RE: Solar Power through Auric Solar with Net metering through Idaho Power Company

We made a very conscious decision to put solar power on our house to get our winter power bill lessened and to contribute to clean energy for the Idaho City area in which we live. A major part of our decision to invest in solar was due to the amount of solar credits that Idaho Power agreed to allow Auric Solar to give us when they talked through putting our solar on our property. We were told that the Net Metering Agreement with Auric and Idaho Power was written in an Agreement that we believed would be a way for us to bank solar credits from the summer to use during the winter. This Agreement was a major part of our decision to invest.

We totally recognized that our investment in the solar panels and installment will not be paid off for many years but we still made the conscious decision to invest in Solar due to the amount the Idaho Power agreed to allow for the credits. We also thought that solar power could potentially be a good selling point in the future if we were to sell our house. We made this investment knowing that we would be supported by Idaho Power through Auric. Unfortunately, we recently received a letter from Idaho Power saying that they will be reducing the amount that each credit would be by as much as 50 percent. We are VERY disappointed that Idaho Power is not upholding their original Agreement with Auric on the amount that they agreed to give us for our solar net meter credits!! We should not have the agreement changed because Idaho Power thinks that they may be losing money from this agreement or perhaps their investors would like more for their bottom line. We made our agreement with Auric and Idaho Power in good faith and Idaho Power should stick to their original agreement with us! Idaho Power should allow us to continue to stay on the net metering program as they agreed to when we signed up. If we had known that our credits could be reduced to the point that our investment would not be worth anything, we would NOT have invested in solar power because it would not pencil out for us – especially in Idaho City!!

The reduction of how much Idaho Power allows us for our net metering will make our power bill MORE than when we originally had power without solar and we still have over \$39,000 to pay off on our solar panels. We would NEVER have invested in solar power if we knew Idaho Power had the ability to change up how much they would pay for our net-metering power. What a sham that is!!

We should be grandfathered in on the net-metering amount that we were promised through Auric that was promised by Idaho Power. And, if Idaho Power wants to change their process of how much they will allow for the net-metering from this point forward, then the new customers should be put in the new program and the people who were promised a certain amount for the net-metering credits in the past should be given the amount that was promised originally, in good faith! It certainly seems unethical for the power company to change this agreement mid-stream especially with the large investment that we had put into our solar panels! We signed up in good faith and Idaho Power should follow through with their agreement with Auric in the same good faith arrangement! Please consider grandfathering us in on the original net-metering price. We went into this investment agreement in good faith and we believed that the power

company was going to do the same. We hope that you support us by making Idaho Power hold true to their original agreement as negotiated by Auric Solar for net metering with Idaho Power.
Thanks for your consideration of this matter

Unique Identifier: 164.165.206.42

company was going to do the same. We hope that you support us by making Idaho Power hold true to their original agreement as negotiated by Auric Solar for net metering with Idaho Power.
Thanks for your consideration of this matter

Unique Identifier: 164.165.206.42