

## Diane Holt

---

**From:** brad.hallman@auricenergy.com  
**Sent:** Tuesday, December 3, 2019 3:22 PM  
**To:** Diane Holt  
**Subject:** Case Comment Form: Bradley Hallman

Name: Bradley Hallman  
Case Number: IPC-E-18-15  
Email: brad.hallman@auricenergy.com  
Telephone:  
Address: 153 S. Harlan PL.  
Eagle ID, 83616

Name of Utility Company: Idaho Power

Comment: I am a professional in the solar industry of Idaho for the past 5 years. I am a licensed electrician and oversee around 15-20 other industry workers daily. My crews are hard-working local people who feed their families thanks to customer's who choose to go solar.

The settlement agreement proposed would likely put some of us out of work, costing the state of Idaho a significant amount of revenue.

Other states have already moved to a time of use or other fair compensation structure for solar customers. The proposed rate changes to solar are discriminatory as the issue is a rate design problem, not a solar problem. Finally, we hope this commission will weigh the total benefits solar provides, and follow through with the previously related solar cases.

Unique Identifier: 164.165.206.42

## Diane Holt

---

**From:** c.pascale.w@gmail.com  
**Sent:** Tuesday, December 3, 2019 2:59 PM  
**To:** Diane Holt  
**Subject:** Case Comment Form: pascale warren

Name: pascale warren  
Case Number: IPC-E-18-15  
Email: c.pascale.w@gmail.com  
Telephone: 2089198268  
Address: 7034 W Hummel Dr  
Boise Idaho, 83709

Name of Utility Company: Idaho Power

Comment: I strongly oppose the settlement agreement in general, and the proposal to impose this settlement agreement on existing Idaho Power customers with solar installations. Any proposal addressing the current net metering program should not be approved until Idaho Power agrees to a fair and just method to value the environmental benefits of solar installations and the avoided transmission and distribution capacity. The environmental benefits are a main determining factor when we decided to install solar panels, and to move forward without a determined benefit devalues homeowners' decisions and investments. Idaho families and small businesses shouldn't have the rules changed on them after they have already made their investment.

There is no rush to complete this settlement agreement. The actual solar penetration levels have not increased to the point that they can be reasonably expected to be impacting Idaho Power's non-solar customers.

Proposing a final value for net-metering customers of 4.4 cents per kilowatt hour is out of step with multiple studies conducted to establish the value of solar. Multiple independent studies conclude 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.

An approach which better balances ratepayers and the utility is established in Minnesota. A summary of the approach can be found at the following address: <https://ilsr.org/minnesotas-value-of-solar/>

I urge you to support customer-owned solar and our private investment. We installed solar panels to meet our own needs and to address our environmental concerns; not to be a power generator. We did not oversize our system to receive credits – we still receive power bills after our credits from the year are exhausted.

I urge you to support customer-owned solar and our private investment. We installed solar panels to meet our own needs and to address our environmental concerns; not to be a power generator. We did not oversize our system to receive credits – we still receive one power bill in February after our credits from the year are exhausted.

Part of our investment in solar includes the value of our home. If the Net Monthly Metering program is not preserved after sale, it is arbitrarily devaluing our home. The solar installation should qualify for this program for 20 years (the expected life of the solar panels) and should be based on the system, not on ownership. In addition, homeowners should be allowed to repair their system as necessary (not expand) without being removed from the Net Monthly Metering program. Allowing existing solar customers to stay on the existing net metering program and applying the new program to new customers is a commonsense compromise that allows all parties to keep agreements made in good faith.

## Diane Holt

---

**From:** paul.strategiem@gmail.com  
**Sent:** Tuesday, December 3, 2019 3:04 PM  
**To:** Diane Holt  
**Subject:** Case Comment Form: Paul Cooperrider

Name: Paul Cooperrider  
Case Number: IPC-E-18-15  
Email: paul.strategiem@gmail.com  
Telephone:  
Address:  
Garden City ID, 83714

Name of Utility Company: Idaho Power

Comment: While the signing parties for the agreement covering IPC-E-18-15 represents a variety of stakeholders, the consumers will end up paying higher rates in the long term as this agreement stifles innovation and modernization of the power industry. Other states with policies and regulations that are more friendly to Distributed Energy Resources will race past Idaho in providing cheaper and more secure power to customers. I urge the PUC to closely watch benchmarks and policies in those states as they actively engage customers in the solutions around power. Such solutions allow power/energy transactions to flow to and from customers in a manner that more accurately reflects market forces, without sacrificing power reliability. Policies and business models that facilitate these sorts of bi-directional power/economic transactional processes will foster greater innovation and accelerate us to a power infrastructure that is more economical and secure. IPC-E-18-15 is a step back in fostering this necessary evolution.

Unique Identifier: 164.165.206.42

## Diane Holt

---

**From:** matt.james.warren@gmail.com  
**Sent:** Tuesday, December 3, 2019 3:04 PM  
**To:** Diane Holt  
**Subject:** Case Comment Form: Matthew Warren

Name: Matthew Warren  
Case Number: IPC-E-18-15  
Email: matt.james.warren@gmail.com  
Telephone: 2088591729  
Address: 7034 W Hummel Dr  
Boise Idaho, 83709

Name of Utility Company: Idaho Power

Comment: The Idaho Net Metering settlement has excluded residential solar producers. This settlement affects our investment; we deserve a chance to weigh in as stakeholders. Changes to the way production and usage are calculated will negatively affect the buyback period for residential producers. A reduction in the rate for residential solar generation will also prolong the buyback period, as well as reduce the overall contribution to the value of the home. All existing net-metering customers should be grandfathered in. Most solar systems last for 20-25 years. We decided to make this investment based on a set of policies and rates, and to change those policies and rates just a year after installation without our consent or input is cheating us, and cheating every other residential solar producer.

Unique Identifier: 164.165.206.42

## Diane Holt

---

**From:** ryan@mcfarlandritter.com  
**Sent:** Tuesday, December 3, 2019 3:15 PM  
**To:** Diane Holt  
**Subject:** Case Comment Form: Ryan McFarland

Name: Ryan McFarland  
Case Number: IPC-E-18-15  
Email: ryan@mcfarlandritter.com  
Telephone: 2087891643  
Address: 1675 E. Picabo Ct.  
Boise Idaho, 83716

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

I am an Idaho Power customer and I have had a residential, roof-top solar system since August 2018. I write to request that the Public Utilities Commission ("PUC" or the Commission") allow me, as an existing Schedule 6 customer, to continue to be compensated under the existing retail rate net metering structure, and not be forced into the proposed new structure as set forth in the proposed Settlement Agreement (Case No. IPC-E-18-15), now pending before the PUC.

### Facts.

1. I entered into a contract to construct a rooftop solar system at my home in Boise in June 2018. The solar system cost more than \$36,000.00.
2. Based on the monthly net metering structure in place at the time of the installation of my system (and still in place today), I expected to recoup the cost of that system by end of year 2028.
3. My solar production system was completed on or about August 23, 2018, and I received a "System is Ready" email from Idaho Power on that day. That email states, "Tariff schedules (including rates and system requirements) are subject to change with approval from the Commissions."

### Reasons.

1. Investment Premised on Existing Structure. The Idaho Power disclosure provides me notice that I cannot rely on rates remaining the same; however, nothing in the Idaho Power disclosure suggests that the fundamental structure of the net metering is subject to change. There is no disclosure of the fact that net metering may be changed from monthly to hourly. There is no disclosure that the credits I will receive will be in cash credits on my account rather than KWHs. Had I been on notice that the entire structure might be changed, I could have designed my system to more effectively, i.e., to take better advantage of easterly and westerly sun during the hours I am home, rather than southerly when I am not home. I almost certainly would not have invested in such a robust system, had I been on notice that the structure of the program – not merely the rates – was subject to change.

My decision to install a solar electrical system – in reliance on the net metering structure – is part of a comprehensive plan to use energy more fiscally responsibly and environmentally friendly. I purchased my first electric vehicle in August 2019, which is powered by my residential solar system, and I plan to by a second electrical vehicle in 2020. These investments will also be compromised if I am not permitted to remain in the existing net metering structure.

In short, my financial decision was made in reliance on the structure of monthly net metering, and this structural change (not merely a rate change) will prolong, and perhaps entirely undermine, my investment. Idaho Power's net metering structure was critical to a series of financial decisions, and now Idaho Power's proposed settlement changing that structure threatens to eliminate the financial benefits of my investment.

## Diane Holt

---

**From:** jcw48@cornell.edu  
**Sent:** Tuesday, December 3, 2019 2:54 PM  
**To:** Diane Holt  
**Subject:** Case Comment Form: Jeffrey Woodworth

Name: Jeffrey Woodworth  
Case Number: IPC-E-18-15  
Email: jcw48@cornell.edu  
Telephone: 7322727792  
Address: 2522 East Plateau Drive  
Boise ID, 83712

Name of Utility Company: Idaho Power  
Comment: Procedural Context

It is important to begin with the procedural background to frame the discussion of whether or not the commission should approve the settlement agreement. In Case No. IPC-E-17-13, the Commission directed Idaho Power to initiate a new docket to conduct a comprehensive study of the costs and benefits of on-site generation on the Company's system, as well as proper rates and rate design, transitional rates, and related issues of compensation for net excess energy provided as a resource to Idaho Power. (See Idaho Power Opening Brief p. 4.) In response, the instant case, Case No. IPC-E-18-15, was initiated. A settlement agreement was reached in the instant case, and a motion to approve the settlement agreement was filed.

The settlement agreement acknowledges that the Commission is not bound by the Signing Parties' Agreement. The Commission will independently review the settlement agreement consistent with Commission Rules 271–280, IDAPA 31.01.01.271–280, to decide whether to approve or reject it, or state conditions under which to accept it. The proposed settlement agreement's proponents ultimately bear the burden to prove that it is just, fair, and reasonable, in the public interest, and otherwise in accordance with law and regulatory policy. (See Staff Comments p. 3.) Analysis Although the purpose of the docket was primarily to conduct “a comprehensive study of the costs and benefits of on-site generation,” the record is almost entirely devoid of any evidence of the costs and benefits of on-site generation for the Company's system and further devoid of support for the methodology of the proposed settlement agreement. As a result, the settlement agreement's proponents cannot satisfy their burden to prove that the proposed settlement is just, fair, and reasonable, in the public interest, and otherwise in accordance with law and regulatory policy. As set forth below, a rate structure based on the costs and benefits resulting from excess energy export would be preferable to the structure proposed in the settlement agreement. Because the record lacks any support for the proposed rate structure and there is a more preferable alternative, the Commission should reject the settlement agreement and instruct the parties to comply with the Commission's original direction to conduct a comprehensive study of the costs and benefits of on-site generation on the Company's system.

The parties use an avoided cost structure to determine the export credit rate. The various comments from the parties lack any support for this choice. The comments discuss the history of the negotiations, state the contents of the settlement agreement, and discuss ancillary issues, but there is no justification provided for the selected framework. (See, e.g., Idaho Power Comments.) The Staff comes closest to providing support for the selected framework when it argues that DSM avoided cost structure is the right method for determining avoided cost, but the Staff provides little justification for using avoided cost as a starting point.

The purpose of the DSM avoided cost framework is to allow a utility company to determine how to best invest money. As the name suggests, the DSM avoided cost framework involves determining the amount of cost avoided by various demand-side interventions. The utility company can then determine how best to allocate their resources by comparing the cost avoided to the cost of the various interventions. This purpose does not suggest it is an appropriate framework for determining rate structures.



Instead, the export credit rate structure should be designed around the unique relationship between the Company and solar customers. The Company is in both a monopsony and a monopoly relationship with solar customers. Solar customers can neither buy their power from nor sell their power to another entity. The *raison d'être* for public utility commissions, such as this Commission, is to prevent utility companies from abusing their monopoly position while still providing a fair return for their investments. The export credit rate structure should be similarly designed to provide a fair profit without allowing the Company to abuse its monopsony position.

In a low-solar-penetration market, the life of a solar credit is as follows:

- 1) The solar customer exports energy to the grid and receives a credit at the export credit rate. The credit is carried forward by the Company interest free.
- 2) Neighbors 10s or 100s of feet from the solar customer receive the exported energy almost instantaneously and are charged the retail rate for the energy.
- 3) Later, the solar customer uses energy from the grid, likely from a remote generation site. The solar customer uses the credit and is charged the retail rate minus the export credit rate.

Note that the neighbors pay the Company the full price for energy but use very little of the Company's infrastructure. In return, the Company charges the solar customer less for the energy received by solar customers that uses the typical amount of the Company's infrastructure. In a high-solar-penetration market, the solar customer no longer exports to nearby neighbors but over long distances, and the cost to the Company is higher.

The settlement agreement rate structure considers the cost the Company would incur to generate energy for the neighbors and provides 100% of the difference between the retail rate and this cost to the Company. However, such a structure provides an undue windfall to the company. The actual costs to the Company to transport energy from the solar customer to the neighbors is minimal, and the rest of the difference is captured as undue profit to the Company. Despite the solar customer providing the investment to produce this gain, none of the difference between the retail rate and the actual costs flows to the solar customer. The Company receives an excessive return on its actual costs. In addition, there are other gains to the Company. Other commenters to this case have noted that the Company can sell the renewable credits for the exported energy. The Company is able to avoid expensive peaking plants to provide power during the summer when energy demand is highest and export is highest. The Company has also pledged to use 100% clean energy by 2045. Solar customers assist the Company with meeting this goal with minimal effort and cost by the Company. Under the proposed rate structure, Company does not pay the solar customer for these benefits and instead reaps the gains for itself.

A fairer export credit rate would be based on the actual costs and benefits to the company of the export. For example, the starting point for the export credit rate should be the retail rate. The costs incurred by the company to support transfer of the exported energy from the solar customer to the neighbors and a fair share of the fixed costs should be subtracted from the retail rate. The various benefits to the company due to the clean nature of the energy and avoided capacity should be added to the rate. A profit that provides a reasonable return on investment for the difference between the costs and benefits should be subtracted from the rate. The final result should be the export credit rate. This export credit rate would fully compensate the Company and provide a reasonable return on investment without providing a windfall to the Company at the expense of the solar customer.

A secondary benefit of the export credit rate framework proposed herein would be that it would send price signals that correctly incentivize investment in solar. Investment in solar would be incentivized when the net benefits are higher than the cost of installation and discourage investment when the net benefits are lower than the cost of installation. In contrast, the settlement agreement framework discourages investment now when the net benefits are high. (See, e.g., <https://www.brookings.edu/research/rooftop-solar-net-metering-is-a-net-benefit/>). As the price of energy rises as well as the costs imposed on the Company system by energy export, the settlement agreement framework will promote undue investment in solar.

The settlement agreement framework also encourages other behaviors that will increase costs on the Company system. The solar customer has two notable options to seize back the windfall that would be captured by the Company under the settlement agreement. The solar customer can install batteries and/or set up a microgrid with the neighbors. In both instances, the exported energy moves behind the meter and is no longer available to the grid. Again, this behavior is encouraged most when the net benefits of export are high and discouraged when the net benefits of export are low. The export credit rate framework proposed herein would more fairly allocate costs and benefits among the Company and solar customers, and it would send appropriate price signals for investments in solar. Accordingly, the Commission should reject the settlement agreement and instruct the parties to comply with the Commission's original direction to

conduct a comprehensive study of the costs and benefits of on-site generation on the Company's system. The parties could then design an export credit rate framework that is fairer and sends appropriate price signals.

If the Commission is inclined to approve the settlement agreement, there are a number of defects with the settlement agreement framework that should be remedied before it is adopted. First, the settlement agreement framework fails to consider all avoided costs when determining the rate. As discussed above, Idaho Power has made a clean energy pledge and is seeking to discontinue use of coal plants. On-site generation reduces the costs of the pledge and the shutting down of coal plants. In addition, the settlement agreement does not discuss the other costs that make up the difference between the proposed export credit rate and the retail rate and why those other costs should or should not be included in the export credit rate. The parties have not provided any support for these omissions.

Second, the avoided capacity is computed based on the cost of large-scale solar resources. But, this method of computing avoided capacity does not reflect the actual economics of peaking plants used to provide such capacity. Peaking plants are operated infrequently and thus have high costs to recoup the investment. The avoided capacity should be determined based on the marginal capacity avoided rather than an arbitrary selection. Again, the parties have not provided any support for this choice.

Third, the 10% reduction in avoided energy value due to non-firm availability is arbitrary. The parties have provided no evidence that the non-firm availability of on-site generation is any different from that of large-scale solar or wind nor any evidence that the prices of large-scale solar or wind energy is so reduced. In addition, the parties have not provided any evidence that 10% is an appropriate amount for the reduction.

Fourth, the Commission should require the parties to align on an avoided cost methodology and replace the zero-dollar placeholders before approving the settlement agreement. In its comments, the Staff noted that "there are currently several significantly different ways to calculate the avoided cost value for resources on the Company's system." (Staff Comments p. 10.) The Staff proposes that additional investigation could result in a new method to determine the value of exported energy. Also, the settlement agreement does not attempt to provide values for several items included in the settlement agreement's avoided cost framework. The Commission should not approve an incomplete rate structure that has a high likelihood of changing in the future. The settlement agreement cannot be appropriately evaluated if it is unclear what the end result will be and how that will impact the Company and solar customers. Moreover, uncertainty has a strong negative impact on investment. Approving an incomplete rate structure that is likely to change in the future will discourage investment when such investment is most beneficial to the Company system. Unclear price signals will not encourage behavior in the public interest. The Commission should not rush to approve the settlement agreement for an arbitrary January 1, 2020 deadline. The parties have provided minimal reasons for why the settlement agreement should be approved before these issues have been resolved and have provided no evidence that approval by January 1, 2020 is necessary. The Staff asserts without evidence that conducting the necessary analysis would have "perhaps derailed" the parties agreeing to the settlement agreement. However, the parties must show that the settlement agreement is just, fair, and reasonable, not that it is what could be agreed upon.

Regarding grandfathering, not grandfathering existing solar customers will also create uncertainty. It will set a precedent whereby new solar customers will be more uncertain about whether future rate changes will affect the return on their investment. Such customers will not receive clear price signals that support investment and encourage behavior in the public interest. Although tariffs are not contracts, the Commission will provide clearer price signals by recognizing the investment of solar customers and choosing a time horizon that allows the solar customer to recover their investment (e.g., forever or 25 years). It will create a precedent that the Commission will honor the investments of solar customers (and indeed any customers), and such customers will behave accordingly.

Regarding who should be included in the grandfathering, the Company proposes a cutoff based on application date. This proposed cutoff fails to recognize the process for installing solar. Solar customers may enter into a contract for solar well before submitting an application to the Company. Such solar customers cannot simply "rescind their applications at their option" as the Company suggests. Accordingly, the Commission should choose to apply grandfathering to any applications before the Commission decision. There is little risk of gamesmanship by solar customers because the status of grandfathering will have been uncertain before the Commission decision. Indeed, the Company has not provided any evidence of such gamesmanship occurring.

The parties have not satisfied their burden to show that the settlement agreement is just, fair, reasonable, and in the public interest. The parties have not complied with the Commission's direction that they conduct a comprehensive study of costs and benefits of on-site generation. The Commission should reject the settlement agreement and instruct the parties to comply with the Commission's original direction to conduct a comprehensive study of the costs and



benefits of on-site generation. If the Commission is inclined to approve the settlement agreement, the Commission should instruct the parties to resolve the issues discussed above. If the settlement agreement is approved, the Commission should grandfather existing customers for an extended time period and apply a cutoff date for inclusion based on the date of approval of the settlement agreement.

Unique Identifier: 164.165.206.42

## Diane Holt

---

**From:** Ninhendrix@msn.com  
**Sent:** Tuesday, December 3, 2019 2:37 PM  
**To:** Diane Holt  
**Subject:** Case Comment Form: Micaela Willard

Name: Micaela Willard  
Case Number: Ipc-E-18-15  
Email: Ninhendrix@msn.com  
Telephone: 208-860-4520  
Address: 588 w 8th  
Meridian Idaho, 83642

Name of Utility Company: Idaho power  
Comment:

I for one am very upset with what Idaho power is trying to do. They are basically a monopoly in the energy market here in southwest idaho. We got solar mainly to help protect the environment from rising co2, and to be able to do our part with this world wide problem. We have relatively lways wanted to go solar and never thought we could until blue raven came with their proposal. It is still costly for us and we cannot afford to add a bigger financial burden to our budget. The only reason and way we were ABLE to get solar was because it was cost effective for us. With what Idaho power is trying to do by "stealing" the power we make is atrocious.

The Commission 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.

Unique Identifier: 164.165.206.42

## Diane Holt

---

**From:** marty\_grainger@hotmail.com  
**Sent:** Tuesday, December 3, 2019 2:19 PM  
**To:** Diane Holt  
**Subject:** Case Comment Form: Martin Grainger

Name: Martin Grainger  
Case Number: IPC-E-18-15  
Email: marty\_grainger@hotmail.com  
Telephone: 2083405539  
Address: 7620 Maxwell Dr  
Boise ID, 83704

Name of Utility Company: Idaho power

Comment: I purchased , and signed a binding contract , that put me and my wife into extreme dept. \$ 40,000.00. Based on Idaho Power to purchase power produced by the solar plant I have bought. There was no stipulation within the agreement that Idaho Power could change the agreement at will. I strongly disagree that you should be able to Default on an agreement that would financially effect home owner and financial institutes, as well as property values, because Idaho power does not like the agreement they made.

Unique Identifier: 164.165.206.42

## Diane Holt

---

**From:** travis@issidaho.com  
**Sent:** Tuesday, December 3, 2019 2:20 PM  
**To:** Diane Holt  
**Subject:** Case Comment Form: Travis Willard

Name: Travis Willard  
Case Number: IPC-E-18-15  
Email: travis@issidaho.com  
Telephone: 208-409-0482  
Address: 588 w 8th st  
Meridian Idaho , 83642

Name of Utility Company: Idaho Power

Comment: The Commission 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

Just like all others we have invested our money in solar

How is a KWh I produced that you sell to others worth less?

Unique Identifier: 164.165.206.42

## Diane Holt

---

**From:** chelsea@chelseahough.com  
**Sent:** Tuesday, December 3, 2019 2:24 PM  
**To:** Diane Holt  
**Subject:** Case Comment Form: Chelsea Hough

Name: Chelsea Hough  
Case Number: IPC-E-18-15  
Email: chelsea@chelseahough.com  
Telephone: 2089211309  
Address: 1  
Boise ID, 83706

Name of Utility Company: Idaho Power

Comment: The benefits of Solar are great, everyone can agree. Reducing the credit is punishment for those who have stepped up and made a responsible decision towards clean energy. Forcing people into a contract that they may not have agreed to in the first place is a step back for Idaho. The implementation of solar is a decision that is weighted heavily by the net metering costs and people should not have the terms changed on them after their decision. This also becomes preventative for anyone considering solar... We need to move forward in Idaho not backwards.

Unique Identifier: 164.165.206.42

## Diane Holt

---

**From:** hvswdt@gmail.com  
**Sent:** Tuesday, December 3, 2019 1:57 PM  
**To:** Diane Holt  
**Subject:** Case Comment Form: David Tupper

Name: David Tupper  
Case Number: IPC-E-18-15  
Email: hvswdt@gmail.com  
Telephone: 2082802219  
Address: 1114 E. 2700 S,  
Hagerman Idaho, 83332

Name of Utility Company: Self

Comment: IPUC

12/03/2019

case number IPC-E-18-15

We decided to look at solar power for our 2 locations in early January. It started making sense that we could make our own power and also be able to share our extra generation to Idaho Power. I understood how this co-op between ourselves and Idaho Power would work. Hence "Net-Metering". We make more power than what we can use during daylight hours "solar", Idaho Power takes this power & is able to sell this power to other customers or to other Power Companies at their highest daily rates. As with solar, we rely on Idaho Power to return supply to us thru the night, during their Low Peak Demands.

My wife & I made a decision to make our own power on the current "Net Metering" plan. Idaho Power claims to be going totally "100% Green" by the year 2045. Shouldn't Idaho Power be encouraging it's customers to follow along to become "100% Green" by 2045? Their proposed plan is exactly opposite of the policy they should be following!

We signed up making an expensive investment with the understanding that Idaho Power & ourselves were in a stabilized agreement, not an agreement that can be changed on a whim! This is not just a rate change, this is a total program change!! Already being an established "Partner" with Idaho Power, we feel at the least, we should be "Grandfathered-in" with the existing agreement with no changes made. If you want to "KILL" future solar investments within our Great State of Idaho, follow what Idaho Power has proposed. For continued growth and independence for the residents of Idaho, LEAVE THE CURRENT AGREEMENT IN PLACE WITH NO CHANGES MADE!

Thank you for your consideration.

David Tupper

1114 E. 2700 S.

Hagerman, ID 83332

Unique Identifier: 164.165.206.42



## Diane Holt

---

**From:** mckinleyalex@gmail.com  
**Sent:** Tuesday, December 3, 2019 2:03 PM  
**To:** Diane Holt  
**Subject:** Case Comment Form: Alex McKinley

Name: Alex McKinley  
Case Number: IPC-E-18-15  
Email: mckinleyalex@gmail.com  
Telephone:  
Address: 1407 E. Jefferson  
Boise Idaho, 83712

Name of Utility Company: Idaho Power

Comment: I urge the Public Utilities Commission (PUC) to deny the settlement agreement presented for IPC-E-18-15. This agreement is not in the public interest. If this agreement is approved then I at least hope that the PUC will maintain the current net metering structure for existing and future distributed generation system installations until a fully defined and fair methodology is agreed upon in a reasonable manner.

Unfortunately, the interveners in this case are agreeing to this settlement because they are fearful of further and harsher retribution from Idaho Power that would have even greater negative impacts on the future of distributed generation in the state of Idaho. Cowing to the political sway and influence of a large monopoly is not in the public interest. The PUC should instead send a message to Idaho Power that the public interest is best served by moving toward a modern and dynamic generation and distribution system.

The costs and benefits laid out in the settlement agreement methodology fall well short of an unbiased and scientific assessment of the rate structure. Instead they inject great uncertainty into the market over the way future distributed generation will be valued. The proposed rate changes will have a negative impact on the current and future users of the grid controlled by Idaho Power. This settlement will also leave Idaho Power poorly placed to adapt to a very near future full of electric vehicles and distributed energy storage.

The rate structure description sent to Idaho Power customers for onsite generation reimbursement does not vary with time of use (daily or seasonally) and will provide a disincentive to conserve electricity at peak times. One simple example is as follows: Customers with onsite generation will maximize consumption during the hottest summer days by turning up the air conditioning or storing on-site generation instead of exporting to the grid. They will do this in order to avoid the greatest price differential between consumption and production rates. This is exactly the situation where Idaho Power currently has the highest residential rates of the year and uses the "AC Cool Credit Program" to reduce load. Electricity being fed back to the grid would be most valuable at this time, however the description sent to customers includes no variability for export rates. Taking this distributed generation out of the mix would then result in a greater peak demand on the overall Idaho Power grid impacting standard customer rates as well as those of distributed generators.

The simplistic nature of the proposed rate structure and drastic projected reduction in the value of distributed generation as described in the communication sent to customers are in conflict with the lack of defined variables in the settlement. Without further development there is no way to value future exported electricity. Idaho Power's current standard residential rate structure clearly shows that electricity has a higher value at peak times of the day in the summer. Furthermore, Idaho Power has a "Time of Day" rate schedule, which is designed to "reduce peak demand on the electrical system", as their website describes. At the very least this type of rate schedule (which is available to other customers) should be available to those with distributed generation.

No customer, present or future, should be forced to move from the current net-metering rate schedule design until the parameters of a new rate structure are clearly defined. In line with that, Idaho Power should be told clearly and directly that an unbiased and rigorous review of all the costs and benefits associated with distributed generation (see other PUC cases) must be completed, and rate schedules designed in the public interest presented, before customers are moved to new rate structures.

Unique Identifier: 164.165.206.42

## Diane Holt

---

**From:** nate-idahogov@ooz.net  
**Sent:** Tuesday, December 3, 2019 11:48 AM  
**To:** Diane Holt  
**Subject:** Case Comment Form: Nate Denning

Name: Nate Denning  
Case Number: IPC-E-18-15  
Email: nate-idahogov@ooz.net  
Telephone:  
Address:  
Meridian ID, 83646

Name of Utility Company: Idaho Power

Comment: The Commission 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.

Unique Identifier: 164.165.206.42

## Diane Holt

---

**From:** kathleen@lavalake.net  
**Sent:** Tuesday, December 3, 2019 11:54 AM  
**To:** Diane Holt  
**Subject:** Case Comment Form: Kathleen Bean

Name: Kathleen Bean  
Case Number: IPC-E-18-15  
Email: kathleen@lavalake.net  
Telephone: 415-823-5378  
Address: 241 West Cedar Street  
Hailey ID, 83333

Name of Utility Company: Idaho Power

Comment: I urge the Commissioners to defeat IPC's proposal to end net metering. Ordinary people would like to do their part to become more energy efficient, but they also want to feel as if they are receiving a fair payment for the power they are generating, and the improvements they have made to their homes, within a reasonable time frame. That is just prudent and good stewardship, and by changing this rule many people will choose not to make those investments. Please protect Idahoans' ability to participate in creating a clean future for our state, and lead the way to a more innovative and broad-based approach to the challenge of energy resilience.

Unique Identifier: 164.165.206.42

## Diane Holt

---

**From:** Thejokulhlaup@msn.com  
**Sent:** Tuesday, December 3, 2019 12:42 PM  
**To:** Diane Holt  
**Subject:** Case Comment Form: Susan Schneider

Name: Susan Schneider  
Case Number: IPC-E-18-15  
Email: Thejokulhlaup@msn.com  
Telephone:  
Address: 7368 N Peppermill Way  
Boise ID, 83714

Name of Utility Company: Idaho Power

Comment: My husband and I invested in rooftop solar panels in October 2015. The solar company estimated that it would take 8 to 10 years to break even on our investment. We try to conserve energy by turning off lights when not in use, using LED light bulbs and conserving on air conditioning during the summer. We made this investment because we thought it was the right thing to do for the environment. We generate excess power during the summer months when demand is highest for air conditioning and when it benefits Idaho Power the most. Boise is moving towards 100% renewable energy and I feel that we have contributed to that goal so it doesn't make sense that Idaho Power wants to discourage and penalize net metering customers. It is not fair that Idaho Power wants to change the terms that we originally agreed to.

Unique Identifier: 164.165.206.42

## Diane Holt

---

**From:** phil@freedomsolarllc.com  
**Sent:** Tuesday, December 3, 2019 12:49 PM  
**To:** Diane Holt  
**Subject:** Case Comment Form: Phil Andrus

Name: Phil Andrus  
Case Number: ICE-E-18-15  
Email: phil@freedomsolarllc.com  
Telephone: 208-230-9889  
Address:  
Nampa ID, 83651

Name of Utility Company: Idaho Power

Comment: I own a small solar company called Freedom Solar here in the Treasure Valley. We are a new company (1 year) but I have personally been in solar for almost 4 years now. Idaho Power's proposed changes have had a severe negative effect on my business. Once it came out to the public, I had cancellations equalling approximately \$230,000 in revenue. I've also spent a few dozen hours trying to figure out an effective way to calculate hourly usage vs hourly production. I ended up with a spreadsheet that was 8,763 rows long... The amount of work required for solar companies to calculate hourly netting and ROI for our customers is ridiculous and not worth our time. I've had both an in-person meeting with Suzanne and a conference call with Connie and Mark. In those discussions, I was left with more questions than answers. The proposed hourly net metering is so complicated that when I asked for it to be explained in terms that I could pass on to my customers, I was directed to their 110 page document that was submitted to explain their entire process in determining this proposition.

Due to Idaho Power's net metering proposal, my business partner left the state and I will be doing the same in the next few months. Idaho Power has done incredible damage to the solar industry with their proposal and if it is in fact passed, will have an even greater negative effect to many small businesses here in Idaho.

My last point I'd like to make is that the ICEA is the organization that pushed for this settlement. The problem with that is that there was no effort by the ICEA to inform or include solar companies/representatives who were not already on their board. Therefore, the first time most of us heard anything was last minute and we've all been scrambling since. A few of us have actually formed a coalition on our own to fight this. Some of us have met with Idaho Power and we've also been trying to meet with the governor on this issue as well. Unfortunately, we just haven't had the time to fight this the right way before the ICEA (who only represents about 3% of the solar industry) decided to settle.

This proposal is bad for small business and even more so, the consumer. This hearing is your chance to make this right.

Unique Identifier: 164.165.206.42



**Diane Holt**

---

**From:** davewren1@gmail.com  
**Sent:** Tuesday, December 3, 2019 12:55 PM  
**To:** Diane Holt  
**Subject:** Case Comment Form: David Wren

Name: David Wren  
Case Number: IPC-E-18-15  
Email: davewren1@gmail.com  
Telephone:  
Address: 4920 W. Blodgett Ln. #101  
Boise ID, 83705

Name of Utility Company: Idaho power

Comment: I work in the solar industry, I believe that all benefits of solar should be studied and given fair value to the public. Customer owned solar should be given priority over all other generation methods. Please do not pass this case until all benefits of solar are given proper recognition.

Unique Identifier: 164.165.206.42

## Diane Holt

---

**From:** Dianeb208@gmail.com  
**Sent:** Tuesday, December 3, 2019 1:02 PM  
**To:** Diane Holt  
**Subject:** Case Comment Form: Diane Baumgart

Name: Diane Baumgart  
Case Number: IPC-R-18-15  
Email: Dianeb208@gmail.com  
Telephone:  
Address:  
Moscow Id, 83843

Name of Utility Company: Idaho power

Comment: I Support's move toward more solar power. It is past time for sustainable power and this proposal is moving use toward less air pollution. The proposal protects my right to select and go solar! I am pleased with that. I have major concerns regarding citizens and businesses that have gone to solar power. They have existing solar power but under this proposal there is a reduction in their investment, sometimes at 50%. That is unfair. My forward looking citizens should not be punished for earlier solar investments.

Unique Identifier: 164.165.206.42

## Diane Holt

---

**From:** ian.kingery@gmail.com  
**Sent:** Tuesday, December 3, 2019 1:10 PM  
**To:** Diane Holt  
**Subject:** Case Comment Form: Ian Kingery

Name: Ian Kingery  
Case Number: IPC-E-18-15  
Email: ian.kingery@gmail.com  
Telephone:  
Address:  
Boise Idaho, 83709

Name of Utility Company: Idaho Power

Comment: A few months back my wife and I concluded that we wanted to help keep Idaho the beautiful place that it is and to be environmentally responsible, so we decided to invest in a PVC system to cover the energy needs of our household. I was recently informed that Idaho Power is making what appears a cash grab to raise the bills of residents with solar power by changing the net metering agreement. These changes will end up adding tens of thousands of dollars to the energy costs of my family. As someone who is trying to put money into 529 accounts for my children to help them with college expenses this really rubs me the wrong way. It basically amounts to Idaho Power changing an existing agreement after the fact to take money away from my childrens' education. I'm sure you can understand how this is unethical as well as unacceptable. To add insult to injury, Idaho Power sells "green energy" to customers at an additional cost of 1 cent per kWh. I don't understand why Idaho Power thinks it is okay to credit such low rates to people who are feeding clean power back into the grid, especially during peak hours when they mark up "green energy" that they sell to customers. I urge you to think about the significant financial impact on all of the people who have invested in keeping Idaho beautiful compared to the relatively low net change in income that Idaho Power would stand to gain overall from this underhanded tactic. Thank you for your time and understanding.

Unique Identifier: 164.165.206.42

## Diane Holt

---

**From:** thomas.sandy.99@gmail.com  
**Sent:** Tuesday, December 3, 2019 11:39 AM  
**To:** Diane Holt  
**Subject:** Case Comment Form: Sandra Thomas

Name: Sandra Thomas  
Case Number: IPC-E-18-15  
Email: thomas.sandy.99@gmail.com  
Telephone: 2087318183  
Address: 1777 W. Wildflower Lane  
Twin Falls ID, 83301

Name of Utility Company: Idaho Power

Comment: Putting solar panels on our home represents a significant investment for us - an investment on which we will likely not live long enough to see any meaningful return. If we had any idea Idaho Power would be allowed to change the game on us we would not have gone forward. We feel Idaho Power should be held to the policy they agreed to. It is unfair and unethical to those of us who have invested our money to produce renewable energy to have them now turn around and penalize us. They should honor their word. Please hold them to the original agreement.

Unique Identifier: 164.165.206.42

## Diane Holt

---

**From:** rosepinkangel@gmail.com  
**Sent:** Tuesday, December 3, 2019 11:41 AM  
**To:** Diane Holt  
**Subject:** Case Comment Form: Nicole Huffaker

Name: Nicole Huffaker  
Case Number: IPC-E-18-15  
Email: rosepinkangel@gmail.com  
Telephone: 2088661688  
Address:  
Boise ID, 83713

Name of Utility Company: Idaho Power

Comment: Idaho Power should keep up its end of the bargain. We have invested in local clean energy expecting a fair deal. We shouldn't have the rules changed on us after purchasing panels to get clean energy. The new proposal could cost my family thousands of dollars on my electricity bill. We put on solar panels in September 2018. We have had them barely a year. Allowing existing solar customers to stay on the existing net metering program and applying the new program to new customers is a commonsense compromise that allows all parties to keep agreements made in good faith.

Unique Identifier: 164.165.206.42

**Diane Holt**

---

**From:** jackswaim46@gmail.com  
**Sent:** Tuesday, December 3, 2019 11:34 AM  
**To:** Diane Holt  
**Subject:** Case Comment Form: Jack Swaim

Name: Jack Swaim  
Case Number: IPC-E-18-15  
Email: jackswaim46@gmail.com  
Telephone: 208-340-8955  
Address: 1540 E Rivers End Ct  
Eagle ID, 83616

Name of Utility Company: Idaho Power

Comment: First: 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. My understanding is that this study has NOT been completed. Second: Grandfathering in existing net metering clients should be an obligation, not a consideration.

Unique Identifier: 164.165.206.42



## Diane Holt

---

**From:** nodawaykid@gmail.com  
**Sent:** Tuesday, December 3, 2019 11:05 AM  
**To:** Diane Holt  
**Subject:** Case Comment Form: Elizabeth Roberts

Name: Elizabeth Roberts  
Case Number: IPC-E-18-15  
Email: nodawaykid@gmail.com  
Telephone: 2088672180  
Address: 1351 N Mansfield Pl  
Eagle ID, 83616

Name of Utility Company: Idaho Power  
Comment: Case Number IPC-E-18-15

I am an Idaho Power customer living in Eagle. I'm opposed to the proposed change to the net-metering program that will reduce the credit received by small solar producers from excess energy produced.

I don't have solar but I prefer to receive electricity that's produced locally by my neighbors with solar over electricity that's been generated miles away by a coal-fired or natural gas plant. I am considering purchasing a solar system for my home.

My neighbors should get the full rate for their excess electricity. The time has come for solar- and wind-produced energy to be encouraged rather than discouraged. Fossil fuel use for electricity generation needs to be phased out.

Sincerely,

Elizabeth Roberts

Unique Identifier: 164.165.206.42

**Diane Holt**

---

**From:** hansleidenfrost@gmail.com  
**Sent:** Tuesday, December 3, 2019 10:57 AM  
**To:** Diane Holt  
**Subject:** Case Comment Form: Hans Leidenfrost

Name: Hans Leidenfrost  
Case Number: Number IPC-E-18-15  
Email: hansleidenfrost@gmail.com  
Telephone: 2085962990  
Address: 9434 Lake Shore Dr.  
Nampa Idaho, 83686

Name of Utility Company: Idaho Power

Comment: Please don't reduce the benefit of net metering! Proceeding with Idaho Power's proposed reduction in net metering benefit will kill solar in Idaho and may cause many owners to default on their solar loans. We made an investment for the next 40 years on a solar system based on the numbers promised through net metering. To change the rules now would be unfair to us and to all who have invested in solar thus far. If the costs of net metering do truly need to be changed, then it would be most fair to change it for all future solar installations where the homeowners are forewarned, and leave the pricing intact for existing owners, up to the 45 year life of their current system.

Unique Identifier: 164.165.206.42

## Diane Holt

---

**From:** karacadwallader@hotmail.com  
**Sent:** Tuesday, December 3, 2019 9:02 AM  
**To:** Diane Holt  
**Subject:** Case Comment Form: Kara Cadwallader

Name: Kara Cadwallader  
Case Number: IPC-E-18-15  
Email: karacadwallader@hotmail.com  
Telephone: 2083690862  
Address: 1019 No 9th St  
Boise Idaho, 83702`

Name of Utility Company: Idaho Power

Comment: I encourage you NOT to limit rooftop solar. It is our future and Boiseans deserve to be able to invest in clean energy Thank you

Unique Identifier: 164.165.206.42

**Diane Holt**

---

**From:** elaine.french@gmail.com  
**Sent:** Tuesday, December 3, 2019 9:03 AM  
**To:** Diane Holt  
**Subject:** Case Comment Form: Elaine French

Name: Elaine French  
Case Number: IPC E 18 15  
Email: elaine.french@gmail.com  
Telephone: (208) 726-1725  
Address: 114 Wall St., PO Box 9320  
Ketchum ID, 83340

Name of Utility Company: ID Power

Comment: Please do not change the rules for existing rooftop solar customers. It is not fair to penalize those who chose to invest early in solar. Changing the net metering rule now is a step backward from our renewable energy future.

Unique Identifier: 164.165.206.42

**Diane Holt**

---

**From:** rodrrene@isu.edu  
**Sent:** Tuesday, December 3, 2019 9:10 AM  
**To:** Diane Holt  
**Subject:** Case Comment Form: Rene Rodriguez

Name: Rene Rodriguez  
Case Number: IPC-E-18-15  
Email: rodrrene@isu.edu  
Telephone: 2082822613  
Address: 541 S. 10th Ave  
Pocatello Idaho, 83201

Name of Utility Company: Idaho Power

Comment: To promote cleaner energy generation in the State of Idaho, Idaho Power should provide a fair market-price reimbursement for both the power used by the solar generators and the excess power they generate. At the very least, those currently with solar power agreements should be grandfathered to the current payment rules and only be changed if they are asked and agree to the new proposed rules.

Unique Identifier: 164.165.206.42