

Diane Holt

From: mikeweese@gmail.com
Sent: Tuesday, December 3, 2019 10:47 AM
To: Diane Holt
Subject: Case Comment Form: Mike Weese

Name: Mike Weese
Case Number: IPC-E-18-15
Email: mikeweese@gmail.com
Telephone: 2088692678
Address: 263 W. CAVE BEAR CT
Meridian ID, 83642

Name of Utility Company: Idaho Power

Comment: I'm writing to lodge a complaint about this proposed change to the net metering program provided by Idaho Power. I believe it is completely unfair to pull the rug out from under solar customers like myself who based the decision primarily on the economic parameters that were placed in front of us, the primary factor being the net metering credits. To change the rules is just wrong, coupled with the fact that Idaho Power is putting up their own solar fields throughout the state and marketing their "green" efforts, what's more green than solar fields on many houses to power the grid? This is hypocrisy at the highest level.

I'm am prepared to be very vocal about my displeasure with this potential outcome, I vote, and I will press all my influence on everybody involved in this decision to do the right thing and turn this down, and like an elephant, I don't forget.

In addition:

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.

Idaho Power should not be allowed to make a profit on the backs of unfairly treated solar customers. Idaho families and small businesses should not have the rules changed on them after they have already made their investment and otherwise relied on Idaho Power's imposed requirements and standards.

Any request for a change to the net-metering program must be preceded by a cost/benefit study performed by a neutral third-party to inform the Commission of the true costs and benefits of solar interconnection and to promote the growth of on-site power generation.

The new proposal could cost existing solar customers thousands of dollars on their electricity bills. Allowing existing solar customers to stay on the existing net metering program and applying the new program only to new customers is a commonsense compromise that allows all parties to keep agreements made in good faith.

When changing net metering, utilities and commissions around the nation allow existing customers to keep the original terms, because it's unethical and unfair not to.

Maintaining existing utility rates and terms for existing customers is a very common practice for other utilities in the region making similar changes – it's reasonable to expect the same for Idahoans.

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

Idaho families and businesses should not be penalized for investing their own money into a program that was created to incentivize purchasing renewable generation. Approving a net metering policy that encouraged investment for long term savings, only to have it invalidated in this manner, is unethical. We should expect more from our appointed officials on the Commission 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.

The Idaho Power plan decreases access, availability, and affordability of residential solar.

Should the Commission adopt the Proposal as-written and decide not to grandfather-in existing net-metering customers, thousands of residential solar energy producers will lose their investment, the expansion of residential solar in Idaho will end, thousands of jobs will be lost, and our beautiful land will suffer.

You are encouraged to personalize your comments and share your own experience - the important thing is to be respectful and drive home the point.

Unique Identifier: 164.165.206.42

Diane Holt

From: Cay and Ron Marquart <mnimages@hotmail.com>
Sent: Tuesday, December 3, 2019 8:32 AM
To: Diane Holt
Subject: New Solar Rules

Dear Commissioners,

We have been solar customers starting in the 1980's where we lived in Nebraska. As new and better systems have evolved, we have adjusted to the new systems when we retired in Boise in 2006. Since our power bills have always been low (as a result of using a clothesline to dry our clothes, installing energy efficient light bulbs, etc), we were told that we would never get a payback before we died. We did it anyway--because it's the right thing to do!!! Sincerely, Cay & Ron Marquart

P.S. Our son, Jesse, misses you!

The following talking points sum it all up:

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.

**A Study of the Impact on an Idaho Family
of
No. IPC-E-18-15 “Net Hourly Metering & Compensation”**

Idaho Public Utilities Commission
11331 W. Chinden Boulevard
Building 8, Suite 201-A
Boise, Idaho 83714

Re: Case No. IPC-E-18-15
Study of Costs, Benefits, and Compensation of Net Excess Energy Supplied by
Customer On-Site Generation

I am a residential customer of Idaho Power Co. residing in Meridian, Idaho. In the summer of 2019 I performed a financial analysis of installing a solar photovoltaic system at my Meridian home. This analysis indicated that the costs of the \$21,450 system would be recovered in 16 years. The analysis was based on the current “monthly net metering” program, the only one available at the time, and the only one offered by Idaho Power.

An application was made to Idaho Power in the fall of 2019 and a 23-panel system was installed. Months after my application Idaho Power informed me of the proposed program changes. The intention of my system was to meet my family’s needs under the monthly-net metering program. The following is the analysis of these proposed program changes on one Idaho family.

I have a Master’s degree in Economics/Econometrics and I am not an expert on Idaho Power, nor on solar systems, however I am an expert on my family’s finances, solar generation, and electricity consumption. In order to perform my analysis of the impact on my family I had to model the electrical consumption of my home for every hour of every day of every month. This means I had to evaluate the consumption by refrigerators, freezers, HVAC system, hot tubs, computer systems, electrical car, and other appliances.

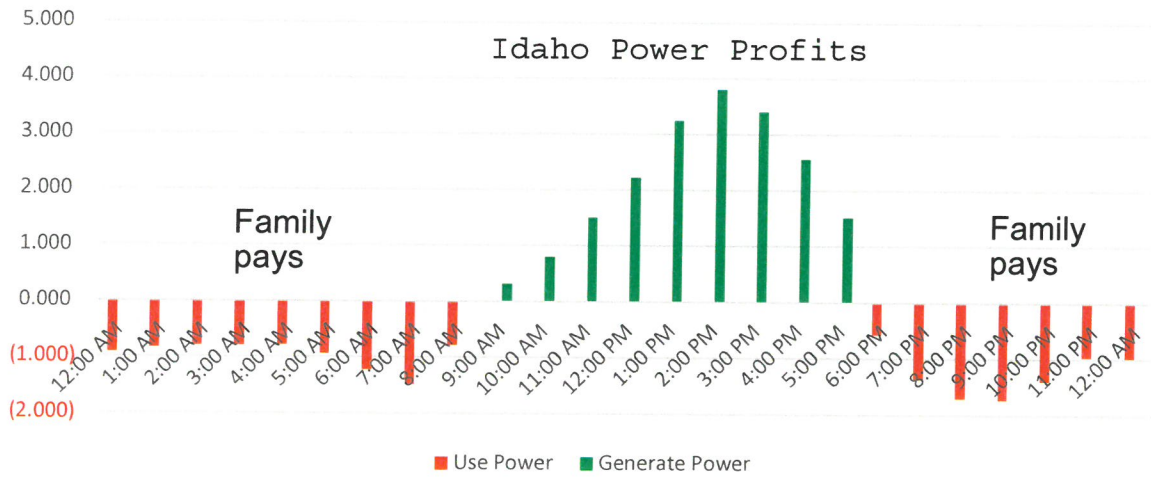
The story begins with my family’s acquisition of a solar system in fall of 2019. The total cost was **\$21,450**, after credits the cost was approximately \$14,500. Under the system of net-monthly metering program at the time of the purchase, my system had a cost-recovery period of 16 years. In simple terms, that means in **16 years** my family will recover the cost of the system, with no profit and no return on our investment. This investment, under the net-monthly program in place at the time of purchase would increase the value of my home and in the event of a sale a large portion of the solar investment would be recovered. In addition, Idaho Power Company would make a profit of \$3,600 on the excess power my system produces.

Under the proposed program changes (Case No. IPC-E-18-15 - Hourly net-metering & dollar charge/compensation to the solar producer) the results the of economics analysis of this family’s solar system drastically changes. The cost-recovery period of **16 years** becomes **36 years** on equipment with a life expectancy of 25 years. Few families would make such an investment in a solar system where the family will never recover their initial costs.

A Study of the Impact on an Idaho Family of No. IPC-E-18-15 “Net Hourly Metering & Compensation”

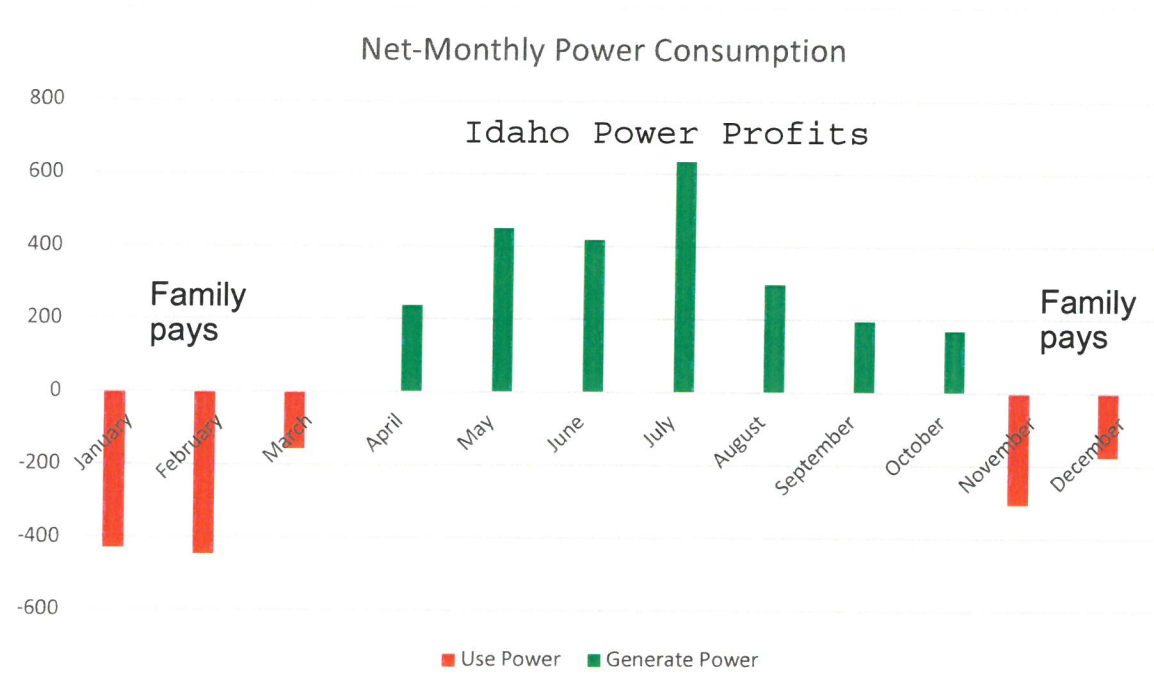
The first question how is that possible? The answer is simple. My system generates the majority of the power during the mid-day and during the summer months (i.e. when the sun is shining), while the majority of the power consumption is in the early mornings and evenings (i.e. outside of the time the sun is shining). The following graph illustrates Idaho Power’s proposed net-hourly consumption and generation of power (net power usage is red and net generation green).

Net-Hourly Power Consumption



A Study of the Impact on an Idaho Family of No. IPC-E-18-15 “Net Hourly Metering & Compensation”

Also, at play, is an annual cycle, as solar production is significantly higher during the summer months due to longer hours of sunshine and the position of the sun. The following graph illustrates the Net-Monthly generation and consumption of energy at my home (net power usage is red and net generation green).



These two factors, the home’s net-hourly consumption and the annual net-monthly consumption along with the proposed pricing under No. IPC-E-18-15 net-hourly metering would create a situation where one economic value is placed on the power consumed, but a separate, much lower, value is placed on the power generated. I believe the standard rate for power consumed is both practical and economically justifiable, and I have no dispute with it. However, the rate now proposed to be paid for generated (exported) power is not justified by any economic or cost-based analysis, and, if adopted, would create the situation where this family’s solar system will never recover the costs. The study of my system and the proposed net-hourly pricing structure the cost of the system will never be recovered **but Idaho Power Company will make a profit of \$25,000 to \$40,000** with no investment and no risk.

How is that possible? Idaho Power’s profit is simple, I am paid a few cents for the excess/exported power, the power flows out of my home to a transformer and back down a powerline to my neighbor’s home. My neighbor is charged full market price and Idaho Power just made 150% off my exported electricity with no production cost, no risk and no investment by Idaho Power.

Who wins? The shareholders of Idaho Power Company. Not one rate payer. This study shows that Idaho Power shareholders and executives win with no investment and no risk, while my family loses.

**A Study of the Impact on an Idaho Family
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The next question for me was whether, under this “net-hourly program” is there any size solar system that makes economic sense to install. A simple cost-recovery analysis shows that the answer is **No!** If this is true for similar Idaho family solar systems, that means few Idaho home owners will invest in solar and that means lower demand and thus the solar industry will cut back and the industry might even move out of state to locations more welcoming to the industry.

This event raises two more questions: With the solar industry gone, who then will provide the warranties to the current solar customers? And the more Important question, is elimination of family owned solar generation systems in the public’s interest or Idaho Power’s? I suggest that Idaho Power’s proposed new rate structure, which, if adopted, would destroy any rational concept of “net” in net metering, will severely impair, or even eliminate, this important element of distributed electrical generation in Idaho and would not be in the public interest. I believe that a more diverse, distributed electrical generation base, particularly one whose capital costs are being borne by Idaho citizens and not the power company, is in the public interest. This is particularly true now, when global warming is threatening our economy and our natural world. Idaho Power’s proposed approach here is an attempt to stave off needed changes in the electrical utility industry, and I believe ultimately would not in the Company’s own interests. The Commission should adopt policies that encourage the utility to broaden its resource base, not narrow it with deliberate and one-sided rate structure that unfairly penalizes rooftop solar.

Finally, this study shows that, if the Commission were to adopt Idaho Power’s under the proposed “Net-Hourly metering program” it would simply constitute the taking of my family’s property by Idaho Power for their benefit and without compensation.

This is because the Company would be receiving power from me for resale at retail rates on its own account without providing me fair and reasonable compensation. A taking also occurs, I submit, under the criteria Idaho Power proposes for maintaining eligibility within this “net-hourly program.” Even if my system were grandfathered by a Commission order, my system would become ineligible for this status when I sell my home or pass it to heirs. At those events the economic value of my solar system is eliminated because my system is then converted to the new, no-reasonable-return-on-investment program.

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Conclusions:

The real study of the economics of rooftop solar at a real Idaho home demonstrates a simple conclusion: IPC-E-18-15 is about profit, greed, and making solar unprofitable. It is about eliminating home solar generation from Idaho Power’s grid. The PUC’s duty is to supervise and regulate utilities like Idaho Power, to be fair, just, and reasonable, and to make decisions in the public interest. The PUC should reject No. IPC-E-18-15 for the following reasons

1. This proposed net-hourly program **takes** a family’s investment and creates a situation where the family loses and Idaho Power profits by way of: (1) a rate differential that is unsupported and unfair; and (2) eliminating the value of the family’s investment at the time of their home sale.
2. Idaho Power’s manufactured credit rate for exported power is a fabrication as demonstrated by my analysis of who really consumes the power my home generates and what they pay for the power I generated. Idaho Power has not shown, and I believe cannot demonstrate, that receiving and reselling electrical energy from my solar system comes at a cost to the Company that would justify such an extraordinary price differential.
3. The proposed net-hourly metering will substantially reduce, if not eliminate altogether, the solar industry in Idaho.
4. My family was not represented in this behind the scenes proposed settlement and was not in any way represented as it is clear no homework was performed by anyone regarding a solar generator of my nature.

The PUC should immediately order Idaho Power Company to provide every customer with access to the customer hourly power consumption for the last year, and should require the Company to complete a thorough analysis of the economics of rooftop solar and its true costs and benefits to its customers.

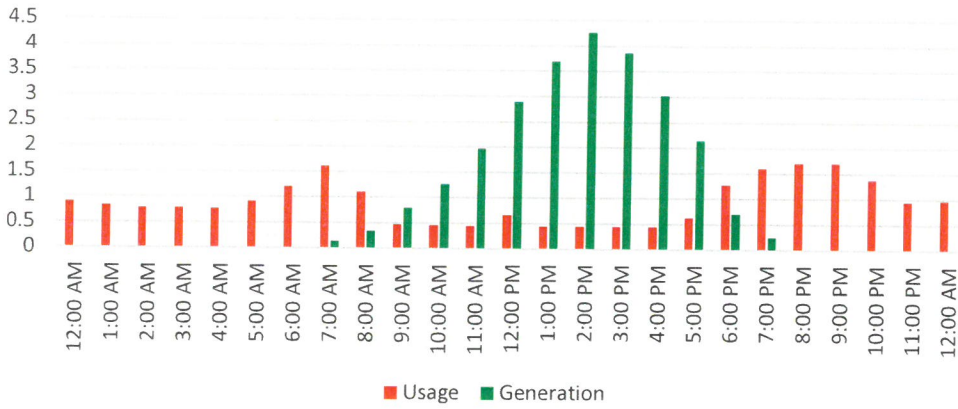
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A Study of the Impact on an Idaho Family of No. IPC-E-18-15 “Net Hourly Metering & Compensation”

Power Generation and Usage Graphs

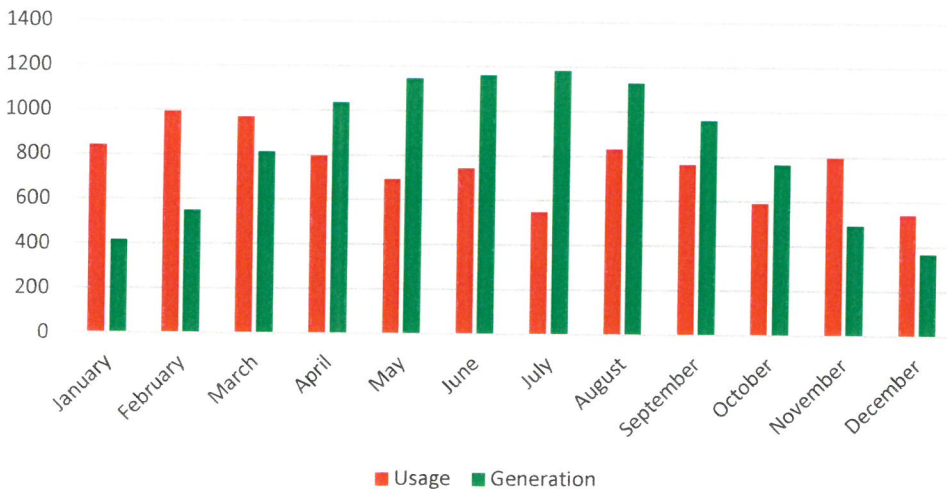
The following graph illustrates power used & generated by hour and demonstrates that usage in the early morning and evenings is the highest, while production of energy is the highest in the middle of the day.

Power Usage & Generation
by Hour



The following graph illustrates power used & generated by month and demonstrates the unique pattern of usage of my home, and the highest is during the summer months.

Power Usage and Generation
by Month



Diane Holt

From: smeloy@grouponesir.com
Sent: Tuesday, December 3, 2019 3:22 PM
To: Diane Holt
Subject: Case Comment Form: Susan Meloy

Name: Susan Meloy
Case Number: IPC-E-18-15
Email: smeloy@grouponesir.com
Telephone: 208-80-9854
Address: 2232 E. Waling Drive
Boise ID, 83712

Name of Utility Company: Idaho Power

Comment: In 2017 I made a very significant investment to put solar panels on my personal residence. It was a major decision, and one that I chose based on many factors, including the benefit to the environment, the community, the value of my home, and also the great benefit that Net Metering would provide back to me over time.

I want to state that I am exceptionally concerned that now Idaho Power is trying to reverse their agreement regarding Net Metering, which has been in effect for many years - unilaterally deciding that they want to do away with the Net Monthly Metering program and replace it with a Net Hourly Billing. This is NOT what I signed up for - and this change will cost me significantly!

Existing customers who made the informed decision to Go Solar based on agreements and circumstances in place at the time should be Grandfathered in and Honored for the investment and commitment that they made. This should simply be done In Good Faith - Period. It was the agreement!

It is quite disappointing to see the changes and double talk that Idaho Power is pushing around = purporting to be so Green and progressive, yet directly damaging the very people who pro-actively started along this path.

Has Idaho Power even completed the study that the PUC instructed them to do regarding actual costs and rates? Where is it? That should be public information and a part of this decision process!

If Idaho Power is having trouble with their export rates, then they should provide the study validating their proposed changes - but those changes should only apply to New solar customer, who can then make their decision to proceed with their investment based on Truth and Facts.

Penalizing existing solar customers (and there are seriously very few of them out of all of Idaho Power's total customers!) is reprehensible. The basis for their investment should be honored and they should be grandfathered in as per the agreement that was in place when they made their investment - just as properties are grandfathered in if their homes/buildings were built before changes in building codes came into play. They were built and bought based on codes/agreements existing at the time - and that is understood and respected. Period.

The solar system on my home was designed and based on the Net Monthly Metering program. It was not designed for this new Net Hourly Billing concept, and it drastically effects the huge investment I made. I should not be penalized like this.

The Net Monthly Metering program should be upheld for all existing solar customers. Both Idaho Power and the PUC should hold true to their words and stand behind the Net Monthly Metering program that existing solar customers signed up for. They Need to be Grandfathered in.

I LOVE MY SOLAR - and I made my investment in solar based upon an agreement that Idaho Power made with me. Idaho Power needs to Stand Behind Their Agreement.It is simply unfair and unethical to do otherwise.

I ask Idaho Power and the PUC to Do the Right Thing here and Grandfather existing solar customers in their Net Monthly Metering program. Just Do It!

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