



IDAHO PUBLIC
UTILITIES COMMISSION

IPC-E-18-15
Boise, Idaho
12/03/19

COMMENT FORM

Please use the space below to file a comment in this case. Add extra sheets as needed.

You may either hand this sheet to a commission staff member or mail it to:

IPUC, PO Box 83720, Boise, ID 83720-0074

You may also post comments on our website:

<https://www.puc.idaho.gov/>

Click on the "Case Comment Form" link

Letter Attached

Print Name Stephen Harrel Sign Name Stephen J. Harrel

Address 23285 Middle Road Phone Number 208-899-5186

City and State Wilder, ID Zip Code 83676

DEC 03 2019

Boise, Idaho

Good Evening Commissioners,

I'm here to speak for putting solar on my home in the next year and for my ^{Adult} children, when they have homes and wish to add a solar system.

Renewable energy is our future, and I don't have the crystal ball to know all the vast changes and improvements we will see in a very short amount of time.

It is however, **reasonable** for all of us to want an affordable way to add a solar system to replace ~~my~~ ^{our} electricity bills forever.

It also isn't **fair** to have a utility company or commission limiting solar production credits by the hour or a decreased KW value or future access fee's to be passed on to me, just because I have solar.

More specifically, it is not **justified** to have a completely different rate structure because I use less power or very little power compared to the average household due to installing a solar system.

The State of Idaho's growth and impact studies may be slightly close to what actually happens.

But if wisdom prevails to know that just watching what other states around us have done or not done as effectively, we can all agree let's not follow their model. Let's be different, let's be better and you can decide to help make us a ^Nation leading State.

So changing the net metering system from monthly to hourly is not the step towards making our utility system better. If all our meters can instantly track positive and negative electricity usage

there is a complete history generated to know how much energy is put into the power grid. Solar is not hurting any customer or the infrastructure down line. Let me repeat...

I believe waiting to see the outcome effect of California's law for all new construction to have solar and if other states like Utah follows suit. It will be important for all of us to understand how to prevent the Affordable Solar Plan to be passed into law requiring every meter to have renewable energy installed on its system.

Can you imagine adding that responsibility to your job duties as Commissioners, overseeing not just new construction, but all residential and commercial properties. Ensuring all solar companies install it correctly, the permit process is followed and the systems pass inspection. And yes, you are responsible for the trickle down effect. Plus preventing a monopoly from taking this business away from the private solar companies to overcharge everyone 2 or 3 the current cost, worse yet leasing systems that you would pay a monthly payment for life.

The wise decision to consider for Net Metering is and knowing what the next step is after this and how high the rate structure will jump in 5 or 10 years. But, when Idaho Power wants to be entirely renewable energy by 2045 and the Cities want that too. Solar will be added across our state and paid for by you, me and my children. A wise solution is to have small incentives and definitely not restrictions to consider adding solar to your home or business. I will be paying for the cost of my system, not a utility company, not the State or other home owners. So covering my return on investment is critical.

Finally, remember if a decision is made, to change net metering billing to hourly or the KW exchange rate decreases, be wary of the next move and the impact it has, especially if you can not unring this bell.

- Legally, I see this decision to not **be fair, just or reasonable** to single out specific customers based on a specific meter type or changing a rate structure. Who's next? Commercial businesses, Cattle and Agriculture, State and Government Municipalities
Thank you.

Steve Harrel
23285 Middle Road
Wilden, ID 83676

Tuesday, December 3, 2019

Idaho Public Utilities Commission
11331 W. Chinden Blvd Ste. 201-A,
Boise, ID 83714

Re: Case Number IPC-E-18-15 Idaho Power's filing to change the compensation structure for residential and small general service customers with on-site generation.

Dear Commissioners Kjellander, Raper, and Anderson:

I have lived in Idaho for nearly 50 years. I consider myself to be a typical Idahoan. I moved here after the Army and completing college because I wanted the independence and environment Idaho life has to offer. I love the Idaho people because we put great emphasis on our values and our ability to make the right choices. Idahoans have a strong dedication to trust and fairness. We put great meaning in the phrase, "My word is my bond."

I am here because I am concerned about everyone's right to capture and use clean and renewable energy – the energy that belongs to everyone. I am also concerned about the personal investment that I and others have already made in renewable energy.

Under the net-metering program, promises and incentives were made to those who wanted to invest in solar energy. Up to and including the present day, the Idaho Public Utilities Commission (IPUC), with its net-metering order, has created win-win rules and utility rates for both Idaho Power customers and the Idaho Power Company (IDPWR). Clearly, the purpose of the net-metering order was to promote and incentivize the use of this important energy resource.

Now, along comes IDPWR with its request to change the net-metering agreement and rates.

My comments are organized into two parts. One is regarding the settlement agreement itself. And the second is regarding the treatment of existing customers who have already signed up for the net-metering program.

Part 1. Is the settlement agreement reasonable, just, and fair?

IPUC staff and IDPWR assert this issue is about IDPWR's right to change the rates. This issue is so much greater than that. It is about where IDPWR Company, a monopoly, is taking us in the future.

Let's look into the future through a telescope. Can we see the goal of getting back to 100% clean-energy getting closer or further away?

Page 2.

When the IPUC net-metering order was issued, IDPWR customers didn't see this as a windfall. Rather, it opened the door to energy possibilities. What the IPUC had created was a clean-energy incubator. The order became popular not because it made customers rich, but because it allowed customers options and opportunities. Solar could be installed without having to buy expensive batteries. The order motivated manufacturers to design and upgrade equipment such that it would meet the IDPWR standards. The order allowed return enough that the customer could see an eventual payback. Most important of all, it created opportunity for innovation with clean energy.

Today, IDPWR claims its clean energy generation stands at about 60% - well below its goal. A goal that is hard to keep when the electricity market demand is growing. IDPWR complains it is concerned about competition and the rate threat by clean-energy generators under the net-metering order. Yet, IDPWR doesn't have to invest one dime to add this clean-renewable energy generation to its base.

Commissioners, IDPWR is not only turning the telescope around, but in addition the telescope is now out of focus. The request by IDPWR doesn't appear to be moving us any closer to the vision of more clean energy generation, at a time when IDPWR is experiencing high demand growth. It does not make any sense at all that IDPWR should be concerned about such a tiny sector of the total generating market in its service area. It should welcome the new generation and incorporate this innovation into its own generating management plan.

It is simply a fool's errand to be wasting all this time and money worrying about minor generating rates when there is such great demand for clean, reliable energy. Commissioners, throw out the settlement agreement and move on to more important matters. Let's grow the total clean energy availability in the IDPWR area.

Part 2. Is it fair or just to change the deal with existing customers?

Commissioners, how would you like it if some power authority suddenly announced that you would now have to perform your job, but for half the pay? Isn't that what IDPWR is asking of those who have already committed to the net-metering agreement?

We had a deal.

Every Business 101 Law class teaches that a contract must contain the following "elements:" The parties agree to the deal (IDPWR and I agreed to net-metering.). An offer and acceptance must be made (The whole net-metering program was presented at the full electrical rate and we, in good faith, accepted the rate.). An element of consideration must exist (We pay IDPWR for power and they credit power to us at the same rate.). The parties have to be capable to enter into agreement (Indeed we were

Page 3.

capable and able to qualify for a loan based on the deal.). And, the agreement has to be legal (lots of evidence here). In the words of James Whitcomb Riley:

"When I see a bird that walks like a duck and swims like a duck and quacks like a duck, I call that bird a duck."

Commissioners, let people call the net-metering deal what they want, but this bird sure looks like a *contract* to me! The problem with IDPWR's request is clear. We had a deal and IDPWR doesn't want to honor it!

When IDPWR informed me about the details and specifications of the net-metering deal, it was all about the win-win for both parties. First, I could generate and use my own power. Second, it let IDPWR avoid using its generating capacity and store the potential energy for later use. Third, if I generated extra power, IDPWR could take it and provide it to my neighbors at the full retail price and credit my account for repatriation sometime in the future.

I relied in good faith on the IDPWR assurances. IDPWR did not notify me or make an obvious statement that it was able to change the rates. Simply by this fact alone, IDPWR should not be allowed now, after we have inked the deal, to change the rates I relied on. Note too that DL Evans Bank relied on the dependability of my net-metering contract to process my loan. Following that, the Idaho Office of Energy relied on these same assurances in order to accept my application and give me the loan. I already have much more than \$18,000 invested in my PV solar system. From the beginning, the net-metering deal I signed with IDPWR is how I would pay off this loan and ultimately realize a return on my investment in my retirement. It is not fair, or just, to let IDPWR back out of the existing deal by citing some hidden excuse that this is allowed because it is a "rate change." Indeed, my mother would say:

"Lies of omission are often lies of deception. "

IDPWR never made their intention to change the rate a visible condition to me, the potential solar customer. I never would have accepted the financial decision and obligation to make the deal had I known what IDPWR was planning. All net-metering customers should have their deals protected and grandfathered in perpetuity. But IDPWR seems to hold all the cards. Senator John McCain once said:

"The more powerful you are, the more likely you are to get what you want."

Don't allow this to happen.

There is a great disparity in bargaining power between the small net-metering customers and Idaho Power Company. The Commission, I think, was formed to provide some counter-balance to Idaho Power given its obligations, size, and its limited competition. I am asking the Commission not to allow IDPWR to change the deal. However, if the Commission does side with IDPWR's request, at least keep those

Page 4.

already invested grandfathered in perpetuity. This will give customers like me the dollar return to maintain, update, and keep their systems operating in compliance.

Conclusion

The IPUC net-metering order is an infinite-sum (an open) solution. The proposed IDPWR settlement agreement is a zero-sum solution. The underlying message here is that small, innovative renewable generators have no freedom to create, control, and enjoy the benefits of developing and using renewable energy resources.

In other words, the little guy doesn't have a chance. If IDPWR's request goes forward, from now on all IDPWR has to do is identify someone else's new generation technology, innovation, and/or development idea as a "threat to its rates" and the small generator business idea is D.O.A!

With the net-metering order as it presently stands, IDPWR is incentivized to research better, bigger and cheaper clean-energy ideas. Keep the order and it opens the door to healthy competition. If the IPUC sends this message to IDPWR, future projects and innovation will be created on the basis of science, technology and economy - not on a basis that leads to hearings, rule-making and regulatory manipulation.

As for those who were motivated to sign up under net-metering, by what sense of fairness or ethical thinking is there justification to pull the deal apart? By what reasoning does it make it okay to allow IDPWR to violate that basic Idahoan tenant - "My word is my bond."

Sincerely,

/s/

Charles Gains
December 3, 2019

Thank you for your attention. Are there any questions?

12/3/19

Ref case#: IPC-E-18-15

Comments

My name is **Jerry Frederick, 89687 S. Black Cat Rd, Nampa, ID 83687.**

This case is about how can Idaho Power make more money similar to how the Government runs the country always wanting more. I know I am but a small spec on IDP radar but it affects my life now and into the future.

I invested thousands of dollars for several reasons.

1. Idaho power has for years requested and promoted everyone using electricity to conserve and make their homes more efficient. Now that many have tried to accomplish just what they asked for, they are now asking us to pay them for doing just that.
2. It was my intent to make my home more ecofriendly and that meant adding solar power to benefit both my family and to benefit Idaho Power. Their intent is to make me pay more for improving my life.
3. If I generate power for my use and allow Idaho power to sell to someone else, the power I do not use, they have to be benefiting at my investment expense. I am sure they are making money on that power they are selling and investing that money. In effect I am loaning them my power generated, and they can sell it at a profit. All I am asking for is my money back (credits at regular Schedule 6 of 8.7cents) without interest. I know IDP will be raising prices as there standard practice.
4. When I signed up for the solar it was going to take a minimum of 10 years to recover my investment dollars. Idaho Power is now trying to screw the people that were trying to help IDP deal with climate change and their need for clean power. If they win all what they are asking for then I as a very small customer will have to suffer the consequences of the PUC decision.
5. Since I am well into my retirement age before I decided to go solar, I needed to think about those people not being able to pay their electric bills. I did not want to be one of them. IDP only cares about how to get more money from those people that did the right thing.
6. It is not right to change someone's life planning in the middle of the stream. They need to allow at least a 10 years of no change grandfather option for those who already invested a large part of their life savings in solar power. In my case with 100% solar ability per year using credits and only allowing 4.4 cents credit after 8 years is the same thing as increasing my power bill by 50% from what it used to be with solar now. This idea of IDP changing to 4.4 cents the rate credit is a real shaft job to their solar customers. It will make a major decrease in the solar business people. Idaho Power cannot justify that much of increase. If they want to lower my cost on the power I use to 4.4 cents from the grid to match my credit sounds good to me.

7. As for their idea of it costing IDP more to deliver power to solar customers, because of equipment etc., they benefit as well to receive my solar power back to them. If there is more cost to them it should only be because of the service they provide. That being the case I would be willing to increase my current service charge they are now billing me by maybe 10 to 20%.
8. I DO NOT want nor do I think it is right or fair to add this cost increase to my KW usage credits. I know they are the big Goliath and I am only little David but the PUC needs to support us small people.
9. I am not sure what their game is regarding the changes for solar people and measuring it on a hourly bases rather than monthly. I am sure they are thinking of a way to penalize solar customers for generating power at a time they may not have use for it. It will be just one more reason Solar power may get hammered.

The main thing I am trying to get to is the PUC should recommend and approve IDP to maintain the current system on credits for KW and allow a 10 year time frame to recoup the cost of installing solar. This time frame would apply to customers who installed solar systems prior to 1/1/22.

Maybe allow some change for any new solar investors.

Jerry Frederick
1/3/19

DEC 03 2019

Boise, Idaho

Thank you.

My name is Mark Ottens and I live at 17949 Goodson Rd, Caldwell.

I built my house in 1974 and have been tied to the grid since then. I installed solar panels in 2016. I paid full rate to Idaho Power for approximately 47 years. Idaho Power, for longer than that, has established a budget for grid upkeep and charged all residential customers that rate to fund their grid maintenance budget.

When a subdivision goes in the developer pays to install a power grid for that development. If they have to upsize or expand the system into that development, then the developer pays to upgrade the system. Idaho Power pays nothing.

Idaho Power has established a rate for grid maintenance for each residential customer to fund this budget. Today their budget is set at \$5.14 per month for all residential customers but because the local solar generator

Been paying grid
upkeep for approx 45
years. Why should
I have to pay more.
Idaho power DOES NOT pay
for installation Just upkeep
cost. They set a budget for upkeep

customer does not write a larger check for power to Idaho Power they state that we have to pay more for maintenance upkeep to fund this budget. That is discrimination.

They get our energy credits.

They do not have to increase generating power for the 3.5% that solar power customers add to their grid. Nor do they have to pay for the maintenance and upkeep of that generating plant, which happens to be my solar panels, which I pay to maintain. Nor do they have to find excess power outside the grid for that that extra needed energy, extra personnel costs.

Idaho has been recognized as one of the greatest areas in the world for solar energy generation. Our energy production days are some of the highest in the world. Why not build on that --- and not make it cost prohibitive?

I DON'T UNDERSTAND
why we have to pay
a larger portion for
upkeep.

We are saving
them cost

I made a business decision based on data provided to me by Idaho Power and the PUC on the established buy-back rate versus my generation costs. Now Idaho Power wants to change the contract to their benefit and to my loss after the fact.

They established a policy to use my excess power, saving them from having to build new power generators. Idaho Power has some of the best statisticians in Idaho. They are saying they figured it wrong and want to change the rules. I sure would like an opportunity to have a "do-over" on some things I may have figured wrong in my life. I am a small customer who invested a lot in this system, and these proposed changes will affect my budget significantly into the red, for-ev-er.

I urge you to deny this request. Thank you

Final HARD SHIP

Commented [T01]:

Commented [T02]:

Testimony of James and Susan Caswell
Before
Idaho Public Utilities Commission
Net Metering Case Number IPC-E-18-15
7 pm, Tuesday December 3, 2019
IPUC Office
11331 W. Chinden Blvd.
Building 8, Suite 201-A
Boise, Idaho 83714

Mr. Chairman, we want to thank the Commission for holding this hearing, and the opportunity to present our views regarding the recent Idaho Power Settlement Agreement requesting changes to the "net-metering" program for customers with on-site generation.

We have been solar users for a little over a year and did not come to the decision lightly to invest in rooftop solar. We did our research, evaluated the risks and benefits both short and long term. We did not make the decision with the expectation of zeroing out our monthly power bill (\$5.00 Service Charge accepted) nor with the idea of recovering our investment in a specific period of time.

We came to this decision for three primary reasons (in priority order). Because: 1) We strongly believe that Roof Top Solar is just the "Right Thing to Do." 2) The availability of IPC current net-metering program, and 3) The availability of the "Federal Investment Tax Credit".

Regarding our number 2 priority, we did research the cases pending before the Commission and while possible changes did give us pause, the Commission was clear that a comprehensive study of the costs and benefits of rooftop solar on IPC's system would be completed before deciding changes. Mr. Chairman, that promise of a full and comprehensive study was not realized. The proposed Settlement is in fact a negotiated agreement with many missing important components. One has to only review the table in Section VII, Titled, Initial export Credit Rates, page 6 of the Settlement to see which components: (Avoided T&D

Capacity, Integration Cost, Environmental Benefits) are place holders in the document. If these components are important enough to be placeholders why were they not fully developed and included in the export rate? This causes us to question the changes proposed and raises doubt as to the fairness of this new program for existing solar customers. Solar customers like us satisfied all requirements imposed by Idaho Power to be accepted into its net-metering program. We relied on IPCs promise of fair compensation for the production of our excess energy. If this settlement agreement is approved as proposed several thousands of residential solar producers will lose their investments, the growth of residential solar in Idaho will be negatively impacted, and many hundreds of good paying jobs will be lost right here in Idaho.

Another significant change is moving from monthly net-metering to hourly net billing. This is a different program that as I understand it encourages or even demands a different design of solar systems. Our existing system was designed to meet the rules of the current net-metering program. It is not fair for Idaho Power to propose and the Commission to approve a new program that forces existing rooftop solar customers onto a new program when our systems were designed and we invested thousands of dollars based on a monthly netting of consumption and production.

Mr. Chairman, we respectfully request the Commission direct IPC to hold true to their word and complete an unbiased study of the costs and benefits of rooftop solar before making any changes to the net-metering program. In addition, direct IPC to grandfather-in existing rooftop solar customers to the current net-metering program. This is a common- sense compromise that allows all parties to keep prior agreements made in good faith.

An Idaho Power Communications Specialists was recently quoted as saying, "that the changes will make customer generation more fair. Customers without panels are effectively subsidizing those with panels." This is sometimes called "cost shifting" and solar is unfairly being identified as the cause, which is why the Settlement Agreement is before the Commission. We take exception to Solar being singled out as it is not necessarily the cause of "cost shifting." Customers who are frugal and do not use a lot of energy, or households who are conservation minded also shift costs to other customers.

We find it ironic that Idaho Power aggressively advertises an incentive-based Energy-Saving Program that also shift costs to other customers. Their incentive program has ten components and once the improvements are approved they will mail an incentive check for as much as a \$1000. These programs are offered for one purpose to reduce energy consumption and the cost to the customer. We burned wood exclusively as our heat source for over 20 years and rarely used our supplemental electric forced air furnace. All efforts that saves or conserves energy "shifts Costs" to other rate payers. Costing shifting is not a net-metering or rooftop solar issue as much as a rate structure problem. Idaho Power recoups some of their fixed costs through a base charge applied to all rate payers in a class, but they also recoup some fixed costs through their energy charges. To our knowledge the rate structure problem has never been examined comprehensively as a settlement solution.

We do not object to paying our fair share of fixed costs to operate the grid. What we object to is a Settlement Agreement that fails to comply with the promise the Commission made to the public "that discriminatory rates would not follow" but follow they will if this Settlement Agreement is approved.

Thank you, Mr. Chairmen.

Respectfully Submitted
Jim & Susan Caswell
3005 Windfall Circle
Emmett, Idaho 83617

Re: Docket IPC-E-18-15

DEC 03 2019

Dear Members of the Public Utilities Commission,

Boise, Idaho

I am a new solar energy customer. In fact, my house is not even finished yet. We started building in spring of 2019. The panels were installed in October and we just passed our inspection by Idaho Power on Nov. 25th.

Our preference has always been to install solar panels on our new house but it is not a decision to be made lightly. Solar panels are almost prohibitively expensive. We looked first to Idaho Power's website to help us make the decision. Idaho Power encourages people to go all electric. They give a substantial tax credit if you do. But the only way having an all electric house is financially feasible is to install solar. Given the stated pay off figures which took into account the monthly Net Metering policies at 100% exported energy compensation, and Idaho Power's stated goals for 100% clean electricity generation which includes solar production, we felt that Idaho Power was fully supportive of private home owners taking this plunge. Thus we decided to install enough solar panels to provide 100% of our energy needs.

But here we are. Idaho Power, without finishing their own studies, has conducted a bait and switch to keep their monopoly. It is a decision that counters their clean energy goal and puts existing solar owners in a difficult financial situation.

We would ask that, at the very least, the PUC grandfather in existing customers into the old net metering system. We had an understanding based on the information Idaho Power provided about net metering and energy export compensation. We invested huge sums of money to further the goal of clean energy. For most people, this decision was not based on any short-term cost-savings since the pay off would be upwards of 20 years. But because it seemed that the investment would at least be revenue neutral in 20 years, we made the commitment to a better future for all. If you do not let us continue with the old net-metering system that allows us to receive full credit for the energy we are generating and measures output over the month, then many of us will never live to see our investment paid off financially. This is unjust. We are contributing to energy production. If we produce excess energy, Idaho Power will profit off that at our expense. This is an exploitation of current customers, plain and simple.

Furthermore, since we did not learn of this new policy until three weeks ago, well after we decided to get solar, we ask that "existing" customers be defined as all those with solar panels installed as of the PUC decision to grandfather in existing solar customers.

Finally, we would like to add that we believe this entire policy of phasing out full credit for energy production is short sighted and will have unintended consequences. The first, of course, is that it will dissuade people from converting to solar power in the near future. Idaho Power should have been working with homeowners to create microgrids as a cheaper means of obtaining the infrastructure they need to establish their goals. Instead they will build the infrastructure on their own and pass those costs onto the consumer. Second, solar panel costs

and battery costs will inevitably decrease. Eventually, this will lead to people decoupling from the grid entirely. This is not a short term possibility but surely it will be by 2045, the stated year by which Idaho Power wants to be 100% clean energy only. Idaho Power is joining the ranks of utility companies all over America that are sacrificing long term goals for short term profits. This is just sad. I mourn for our planet.

Sincerely,

Nirmala Sandhu @ Ben Schwartzman.

5909 Midsummer St.

Boise, Idaho

83716

Solar installation in our new build at 2115 W. Bannock St., Boise, Idaho 83702



**IDAHO PUBLIC
UTILITIES COMMISSION**

IPC-E-18-15
Boise, Idaho
12/03/19

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IPUC, PO Box 83720, Boise, ID 83720-0074

You may also post comments on our website:

<https://www.puc.idaho.gov/>

Click on the "Case Comment Form" link

I am a low-income yet socially conscious Boise resident that chose to sign up for solar with the understanding that my payment for my solar panels would stay the same & never change & that my agreement w/ Idaho power would also never change. I was told that any current Idaho Power customers on the program would be grandfathered in at the current agreement in the event of any further changes. If I were required to pay a bill to Idaho Power, ~~plus~~ for my solar panels, it would be a significant financial hardship for me. It →

Print Name Jennifer Harrington

Sign Name [Signature]

Address 6240 W. Butte St.

Phone Number 208-484-3676

City and State Boise, ID

Zip Code 83704

is unethical & unfair to change the rules on people after they have already made a long-term commitment to purchasing their panels.



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WHAT IS THE PERCEIVED NECESSITY FOR THE REDUCTION IN
CREDIT VALUATION? I HAVEN'T SEEN THIS EXPLAINED ANYWHERE.
AT THE VERY LEAST, THE CREDIT VALUATION^{DE-} SHOULD APPLY ONLY TO
FUTURE SOLAR INSTALLATIONS, NOT EXISTING ONES, AS THE DECISION
TO INVEST IN THIS TECHNOLOGY WAS BASED, IN LARGE PART, ON
THE CURRENT POLICY. IN ADDITION, THIS EXCEPTION TO THE NEW
(PROPOSED) REIMBURSEMENT RATES SHOULD STAY IN EFFECT FOR
THE IMPACTED ADDRESSES, NOT THE PROPERTY OWNER, AS THE
DECISION TO INVEST IN THIS TECHNOLOGY WAS, IN PART, BASED
ON OUR POTENTIAL INCREASE IN PROPERTY RESALE VALUE WITH
A SOLAR POWER INVESTMENT. IF OUR CURRENT RATE OF CREDIT
CAN'T BE PASSED ON WHEN WE SELL OUR HOME, WE'LL SUSTAIN
A SUBSTANTIAL LOSS ON AN INVESTMENT MADE IN GOOD FAITH (OVER)

Print Name

BRUCE GREEN

Sign Name

Bruce R Green

Address

1872 So. LITCRESTSt

Phone Number

303-931-5950

City and State

BOISE, ID.

Zip Code

83712

WITH IDAHO POWER AT THE TIME OF PURCHASE, THIS IS A
CRITICAL POINT FOR CONSIDERATION, AS THE FINANCIAL IMPACT ON
HOMEOWNERS WOULD BE SUBSTANTIAL IN REGARD TO HOME RESALE.

THANK YOU,

BRUCE GREEN



**IDAHO PUBLIC
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WE RECENTLY PURCHASED ENOUGH SOLAR
PANELS TO PROVIDE 100% (AND THEN SOME)
ELECTRICITY FOR OUR HOME. THIS WAS
NOT CHEAP BUT WE KNEW THAT IN
ADDITION TO DECREASING OUR CARBON
FOOTPRINT, WE WOULD BREAK EVEN
IN 10 YEARS. IF IDAHO POWER IS
ALLOWED TO RENEGE ON THE ORIGINAL
AGREEMENT, WE MIGHT NEVER RECOVER
OUR MONEY. IDAHO SUPPOSEDLY WANTS
TO BE A LEADER IN SOLAR POWER BUT
I AM FAIRLY CERTAIN THAT THIS "NEW
DEAL" WILL KEEP MANY HOME OWNERS

Print Name Althea Lewis Sign Name AL L →

Address 2716 W. Madison Phone Number 770-309-5183

City and State Boise, ID Zip Code 83702

from doing the responsible things



IDAHO PUBLIC
UTILITIES COMMISSION

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THANK YOU FOR THE OPPORTUNITY TO RESPOND, I WOULD
LIKE TO MAKE SEVERAL POINTS:

① AS A ROOFTOP SOLAR OWNER, ALL I AM INTERESTED
IN IS A FAIR TRANSACTION WITH THE UTILITY COMPANY (TO POWER)
TO RECEIVE A FAIR MARKET VALUE FOR MY CONTRIBUTION TO THE
GRID. I BELIEVE THAT VALUE SHOULD BE MARKET BASED -
I DON'T WANT OTHER IDAHO RIVER OWNERS TO BELIEVE (IN
PERCEPTION OR REALITY) THAT THEY ARE SUBSIDIZING MY SYSTEM.
TO THAT END, A PRICE THAT DEESCRATES OVERTIME
ABSENT MARKET REALITY IS NOT FAIR - IT IS PREDATORY MODEL
INTENDED TO DISCOURAGE A DISTRIBUTED POWER GENERATIONAL
MODEL & SUPPORT IDAHO POWER EXCLUSIVELY. OVER →

Print Name DAVID KIRK Sign Name [Signature]

Address 12565 N. SCHICKS RIDGE Phone Number (208) 484-2238

City and State BOISE, ID ~~83714~~ Zip Code 83714

② I PURCHASED MY SYSTEM BASED UPON AN ECONOMIC MODEL THAT ENCOURAGED INVESTMENT. IT WAS NOT A MONEY MAKER, BUT THE COST WAS SUBSTANTIALLY OFFSET BY SAVINGS. THIS CHANGE WOULD DRAMATICALLY REDUCE THAT RETURN. NOT ONLY IS THIS UNFAIR CONSIDERING ROOFTOP SOLAR INVESTMENTS ARE TYPICALLY 10 TO 20 YEARS IN DURATION, BUT NEGATIVELY IMPACT FUTURE INVESTMENTS IN SOLAR BY CONSUMERS. IS THIS ~~THE~~ WHAT WE SHOULD BE DOING IN LIGHT OF DEPLETING NON-RENEWABLE ENERGY SOURCES & A WARMING PLANET? I BELIEVE WE NEED POLICY THAT ENCOURAGES A DISTRIBUTED, RENEWABLE BASED POWER GRID.



IDAHO PUBLIC
UTILITIES COMMISSION

IPC-E-18-15
Boise, Idaho
12/03/19

COMMENT FORM

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IPUC, PO Box 83720, Boise, ID 83720-0074

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My husband & I installed solar panels on our home in 2018 after much research, debate, & cost-benefit analysis. It was a significant investment but we moved forward because this long, calculated investment proved to be worth it from all angles. This significant investment meant postponing paying off our home & has impacted other major life choices but the ^{added value} ~~added value~~ to our home plus other benefits made the most economical sense for us & we felt for Boise & Idaho. However, the change Idaho Power seeks to make, including the "grandfather clause", is an absurdity because it makes zero economical sense for those of us who have already invested nor for Idaho. It only seems to make sense for Idaho Power but only in the short term. ~~The~~ The Department of Energy recently released a report (Oct. 2019) showing wind & solar "will dominate" as energy resources. ~~due to~~ Compared to hydropower, solar does not have collateral damage (i.e. salmon runs) & uses 130% less land. Also compared to hydropower, solar is not dependent on the increasingly unpredictable snowpack due to climate change.

Print Name Nicole Hanson

Sign Name NHanson

Address 1002 N. 8th St.

Phone Number 208-340-3500

City and State Boise, ID

Zip Code 83702

~~original damage~~
unpredictability of climate change

~~the of the~~

~~depth of energy gas wind solar cell bond~~



**IDAHO PUBLIC
UTILITIES COMMISSION**

IPC-E-18-15
Boise, Idaho
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I gave testimony, but wanted to still accomplish a couple more things given just how important this decision is to my family, our personal finances, our largest single investment being our primary residence where our solar panels are installed, and our hope for the future.

• First, I want to see the faces of those who have so much say over me and mine. I wanted to look each of you in the eyes, but I can tell I won't be able to do to live, but you should know how much this will affect me & what weighs on me.

• I also want to state how the "grandfather" clause would still hurt all current investors. If you cut an asset's value in half, don't tell me you didn't also take money out of the "real value" of that asset. If you make all solar less desirable, the assets inherent will diminish.

Print Name Joseph Schueler

Sign Name 

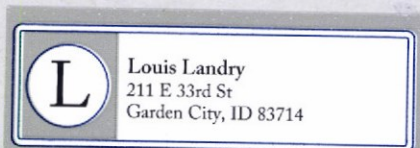
Address 1002 N. 8th Street

Phone Number (208) 724-7047

City and State Boise, ID

Zip Code 83702

So too will the value of my home and market values for all solar, a much needed asset.



phone: (208) 890-0886

lou.landry@cableone.net

12/3/2019

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

Idaho Public Utilities Commission
Office of the Secretary
RECEIVED

DEC 03 2019

Boise, Idaho

Re: Case NO IPC-E-18-15

Dear Ms. Hanlon, Members of the Commission:

I've been
Following the net metering issue for years
(I am a proud owner of roof top solar on my
home in Garden City. - I net meter.)

First, I have watched for years as Idaho Power
has tried for years to throttle roof top solar & with that
scuttle of net metering.

My understanding ^{was} that this case ^{purpose} ^{was} ^(The Study) to study ^{the cost}
and benefits of on-site generation on Idaho Power's
System.

The proposed settlement HAS NOT provided The
Study noted above.

This case should be tabled until The Study
is completed, analyzed, and public reviewed. - over -

examples that must be addressed before a real settlement can be made

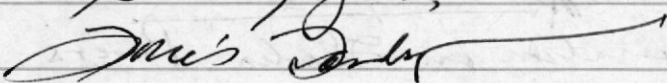
- ① "3." avoided transmission & distribution capacity losses
- ② "4" " " " "
- ③ "5" integration costs
- ④ "6" environmental benefits

How can you possibly proceed without determining the value ^{noted} ~~in~~ in four areas noted above?

Transition Period

I ask a basic question: If a utility company (e.g. Idaho Power) had to accept a change in reimbursement structure what type of "Transition Period" would be acceptable. How does the transition period work if Idaho Power has to decommission a generating facility, e.g. coal.

What type of precedent is the IPUC establishing with this transition period concept?

Sincerely yours,

 Louis LANDRY



**IDAHO PUBLIC
UTILITIES COMMISSION**

IPC-E-18-15
Boise, Idaho
12/03/19

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<https://www.puc.idaho.gov/>

Click on the "Case Comment Form" link

See Attached

Print Name

LOUIS LANDREY

Sign Name

Lou Landrey

Address

Phone Number

City and State

Zip Code

Idaho Power shareholders are being fed enough profit they should not be hogs. Does Idaho Power need financial help from net-metering solar clients who are less than 1% of its client base of when the Annual Report stated, "Last year marked IDACORP's eleventh consecutive year of earnings growth. Net income increased \$14 million from 2017"

Net Income up 6.77%

Earnings per share up 6.65%

Dividends per share up 7.14%

Average Return on Equity has not dipped below 9% in the past 5 years.

Book Value has increased from \$38.85 in 2014 to \$47.04 that is a 21% increase.

As a net metering Idaho Power customers our family invested our own money in good faith that we would always have the same net metering formula. IDP must keep our implicit agreement. Even the current Idaho Power website on their FAQ page and still shows a 17 year payback simple savings back expectations which uses a rate of approximately 8.3 cents /kWh. That is an explicit expectation for current investors too. Idaho Power's new scheme would only pay customers at 4.9cents/kWh for summer excess produced power and then sell it for 8.7cents/kWh. That is outright theft. It will cut our family's investment by 49% during that time. It will also effectively crush the current Idaho solar industry we enjoy today and end our local efforts to curb climate change by making net metering solar prohibitively expensive.

Currently there are 558,000 Idaho Power retail customers and only 4800 or .9% are net metering clients. Even if all 5500 net metering pending permits were added it would still only is 1.7% of the client total. They are not the threat, Idaho Power greed is.

Their website page says, "Idaho Power welcomes your interest in solar and renewable generation. To help you research your options, we've developed the following list:" There are 32 checklist boxes to review to see if "Solar is right for you". After the 12th box there was a note that "net metering is not a contract and rates could change. Their webpage did not have all this when I started investing in solar net metering in 2013. At the 20th checklist box it uses current rates at 8.71cents/kW for payback estimates & it could go up to 12 cents. After the 21st box IDP italics estimates an annual increase of 1.3% increase/year for next 18 years. These are currently explicit expectations for

constant or improving rate payback to the prospective solar client. Given these implicit and explicit agreement examples the rates should stay the same for new as well as current Net-metering clients.

The annual report section on risks stated that promoting energy efficiencies including net metering have mechanisms such as the Fixed Costs Adjustment to address them. It also lists climate change and significantly increased market prices during the summer peak as risks. These risks could be mitigated by distributive net-metering rooftop solar. Since Idaho Power touts a stated goal of 100% clean energy, positive past and projected returns for stockholders, there's absolutely no good reason for increased rates for existing or new net metering clients. Clean energy net metering solar customers are not money source for greedy stockholders.

Climate change catastrophes are already with us and will get worse for our children and generations to come. Since Washington politicians have reversed American progress, our only hope is to do everything we can personally and locally to slow it. Keeping net metering incentives at full retail pricing is mandatory. We are expecting that you deny all of IDP requests. We can predict what Climate Change effects will be; we can't predict how people will react to those who are irresponsible. Don't let greed win, remember, "Pigs get fed but Hogs get slaughtered."

Ed Wardwell
13268 Dechambeau Way
Boise, Id. 83714
208 229-8778

To: Idaho Public Utilities Commission
PO Box 83720
Boise, ID 83720-0074

~~January 14, 2013~~

3 Dec 2019

Case No: ~~IPC-E-12-27~~
Name: Keith Woodworth
City: Caldwell
State: Idaho
Zip: 83607
Day time phone: (208) 402-4127
Name of Utility Company: Idaho Power
Public disclosure: Acknowledged

IPC-E-18-15

Proposal Comments

I have been an Idaho Power (IP) Net Metering customer with both a PV system and a Skystream 3.7 wind turbine since the summer and fall of 2008. To date, I have requested and received one payment for surplus KWs from Idaho Power. At my request, a buffer fund was retained by IP for costs not covered during any future billing period by on site production.

Based on records for the period of July 19, 2011 to July 19, 2012, my turbine produced 1,868 KWs, the PV system produced 5,059 KWs and the residence used 4,370 KWs. In turn, a surplus of 2,557 KWs were returned to Idaho Power which covered the monthly \$5.00 administrative costs, and contributed to both the buffer and refund amounts. Due to mechanical problems, the turbine has been "off line" enough to make comments based on annual production rates approximate BUT, it appears that 72% of the wind power production occurs between October and April and about 30% of the PV production occurs during the months of June, July and August. The system does supply power back to Idaho power during the summer peak rate period.

With a nameplate capacity of 4.940 (5.540 with Skystream @2.4?) my residential system falls under IP's proposed Schedule 6 as outlined in the testimony of Matthew T. Larkin of IP.

The following comments follow the outline presented by Mr. Larkin.

History: Staff concerns, P7,22-29, P8, 1-13. The likelihood of a residential system being "0" is remote. More than likely, the system has produced a KW surplus which was distributed and sold by IP at the time of production. As most residential systems are PV, any surplus produced offsets IP's dependence on higher cost "non-green" energy sources. This ignores any cost reduction associated with the voluntary IP "Green Credit" program.

Although the administrative cost is now \$5.00 instead of \$2.51, the original analysis does not appear to take into consideration (probably does but I can't see it) the net meter customers contribution to the grid during peak demand periods at the present rate of

Same song, another verse! Numbers are out of date but the ideas are unchanged!

\$0.0525 instead of the estimated \$0.12 cost associated with producing this power at a newly constructed facility. Presently, power costs from the gas fired New Plymouth facility may be lower - but, for how long?

P9, 14-20. I don't understand how the costs to serve net metering customers are significantly different from that of any other residential customer. We have the same lines, meters and at least in the past, the same use rate costs. With the new AMI (Smart Meters?) - the IP cost of service with proper management should decline. (note: our meters are not remotely readable yet)

P10, 9-15. Minor point but as a paying customer I question the 353 customer number. Once the economics of this proposal are evaluated by the "Applicants", I would think that at least some will reconsider their application status. As proposed, I know I would!

Capacity Limit: P11, Figure1. The chart shows that there are roughly applications totaling 250 KWs of nameplate pending. Treating these "Applicants" as "Customers" would imply that they were notified of IPs pending proposed Net Metering service rates and requirements.

When proposing such a major change to the existing net metering costs, why would an increase in the capacity limit be requested or approved before the effects of any newly levied rates were evaluated?

Pricing: Not having access to IP's energy costs, this is beyond my review. My records show that I paid IP \$4,653.67 for a third of the cost to run an overhead power line to a point on adjacent property, then \$1,506.00 to run underground (trenching and backfilling were an additional cost) service to a transformer and meter on or adjacent to the residence. Unless I have missed something, that did put me on equal footing with the cost of providing service to any other IP residence customer. BUT, with my PV and wind unit, on a monthly basis I'm not generally buying power produced by IP. On a daily basis, I recognize that I am using IP produced power (no night or "dead air" power from an on-site battery storage system). As pointed out by several commenters', I am certainly producing "green KWs" [which are (sold at a profit?) sold by IP] back into the IP distribution system during peak demand use periods. It would also appear that my wind power is mainly produced during the winter period when IPs dam reservoirs are being recharged. That should be more of an asset than a liability to the IP system.

The IP proposal of \$20.00/ month to cover "administrative costs" which includes \$15.00 of "potential inequity(s)" (what ever they might be) is truly a green energy program 'fatal blow' for customers having no intentions of being major (MW) energy generators.

Perhaps another approach to residential PV/wind units would be a simplified "admin" billing system. As an example, on January 1, each residential net metered account would have a deposit (an amount supported by site specific analysis). At 0:00 AM on June 1st, for \$20.00, IP would take a "Smart Meter" reading and calculate a bill/statement based on used/produced KWs. At this point the account deposit would be adjusted and IP would

send an accounting bill/statement showing the account balance. Again on August 31st at 12:00 PM/0:00 AM IP would again read the meter for another \$20.00, calculate and send a bill showing an adjusted account deposit. Finally on December 31st, IP would read the meter, then submit a bill to either maintain the account deposit or "Zero"-(cut a check)-for IP's side of the account after of course deducting the third \$20.00 admin cost. In this example, base load is not a consideration.

I don't know how the proposed charge of \$1.48 per KW of Base Load Capacity would affect me, but assuming that it is also in the "spirit" of the proposed \$20.00 per month administrative fee it could be harsh!

Excess Net Energy: IP's definition of "Excess Net Energy" provides a measure for accounting purposes but the measure as used by IP is not specific to any particular time of day. This goes back to PV panels producing KWs during high demand summer periods. On any given day IP would call these "excess" but in reality they should be viewed as "green" surplus being used to lower IP's use of what appears to be more expensive carbon based energy sources.

I find it difficult to believe that "FERC" could get really concerned over residential power generation probably measured at less than 1 or 2 MWs/year. On the contrary, in light of the nationwide "greening", I would imagine that they would be happy with a lot more small residential generation!

A "Google" search of Avista Corporation failed to show that this system of "Taking" KWs on December 31st is uniformly applied to Avista's customers. Avista customers in Washington (and Oregon?) are reimbursed on a July 1 – June 30 fiscal year basis. It is recognized that Idaho and possibly Oregon customers are not eligible for this "... Cost Recovery/Annual Incentive Payment..." program as the Washington State Department of Revenue is also a program player. Any idea what FERC's position on this existing payment program might be?

Final Comments: A partial list of the Idaho entities involved in my PV and Wind turbine project include: IP Company Permitting, Excavation Contractor, Alternate Energy Contractor, Canyon County Zoning & Planning, Canyon County Building Permit staff /Field Inspector, Canyon County Electrical Inspector, Idaho State certified Electrician, Idaho State Electrical Inspector, IP Field Inspector. Concrete, electrical cable, conduit, wood and locally acquired re-bar would make up most of the rest of the cost list. The possible effect of this proposal is far more extensive than just an agreement between a Net Metering Customer and IP!

Is "Base Load Capacity" a new billing item for all residential power customers or is it only proposed for Net Meter customers?

Respectfully,



Keith Woodworth

any look at the age ^{group} ~~groups~~ most affected by the current proposal?



IDAHO PUBLIC
UTILITIES COMMISSION

IPC-E-18-15
Boise, Idaho
12/03/19

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- Thank you IPUC for your review for this Clean Energy issue
- Idaho Power - "Branding" is the promise of "The Power of Green" and made it very clear with incentives for us to put in solar panels and to commit to clean energy for Idaho.
- We in good faith just put in solar roof panels a month ago with understanding ^{"website"} indefinite 0 net metering & 1 to 1 on extra power. -
- If Idaho Power goes through with this plan they are breaking promise! We wouldn't have put in Solar.
- We put in the solar after thinking about it for 10 yrs. ~~then~~ within days of installing we got the "letter"
- Hourly net metering is not acceptable (^{stealing} our power)
- Please Grandfather us in - 0 net metering as promised.

Print Name Linda Aman Sign Name Linda M. Aman

Address 7263 Southern Vista Ct Phone Number 503-691-1586

City and State Star Idaho 83669 Zip Code _____



An IDACORP Company

A silhouette illustration of a community landscape. On the left, there are evergreen trees. In the center, a row of buildings including a house, a shop with a striped awning, and a larger multi-story building. To the right of the buildings are several wind turbines. Further right, a solar panel array is shown with an arrow pointing to it from the text "You have the power to invest in a greener energy future." A person is riding a bicycle on a path to the right of the solar panels. On the far right, there are more trees, including a large deciduous tree.

Branding Promise

The Power of Green!

You have the power to invest in a greener energy future.

- When you join, you are using a 50/50 blend of renewable solar and wind energy from projects in Idaho, Oregon or Washington — for just an extra penny a kilowatt-hour (kWh).
- Your participation also supports Solar 4R Schools, which is a great way to teach the next generation about sustainable energy.

Learn more: idahopower.com/greenpower



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I personally invested into solar for my home because it's the right thing to do for the environment. The return on my investment is 20 years. ~ Not a return any business would find a smart investment. ~~into~~ The proposed changes to reduce the net metering arrangement will cost me more money and extend the ROI. ^{30 years} I feel it's only fair that our Public Utility Company, Idaho Power, compensates me fairly for the energy I am contributing to the grid. I am not a business intending to sell my power to the highest bidder. I am a resident, making a personal choice ^{who} to make a large investment to live green. I also do not agree with the viewpoint promoted by some people, that the public is helping me pay for my solar - That is absolutely not true. It was my investment & I do →

Print Name Katherine Kirk Sign Name 

Address 5903 W. Torrylin St. Phone Number 208-229-1963

City and State Boise, ID. Zip Code 83714

not receive ^{financial} compensation that ~~contributes~~ ^{reimburses} to paying me for my Investment. I generate more power than I use and I think it's only fair that Idaho Power gives me a full credit based on fair market value for the days my system is unable to produce power. Idaho Power sells the average my system contributes and makes money from my Investment. ~~From the perspective that~~ Idaho Power is benefitting from my investment ^{and} without compensation at a fair market value it is unfair.

I studied solar and wind power as part of a continuing education program at The University of Colorado, Boulder in 2010. At that time, Colorado residents could receive federal and state tax incentives as well as financial incentives from the Colorado Public Utility. At that time, entire neighborhoods were installing solar panels on rooftops. And the power company was encouraging the expansion - because for the public utility company it was a much less costly investment to encourage residential solar generation than building another coal plant or large solar farms. It was so encouraging to see that kind of commitment to solar and community partnerships.

I am strongly opposed to the new net metering agreement with Idaho Power. I think it is incredibly unfair. And I respectfully request you to support fair compensation based on market value.

Idaho ~~values~~ values our freedom and Independence to make choices for ourselves. We oppose monopolies and regulations that limit choice. Let's keep Idaho the free state that we love. Thank you!



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I was born & raised in Boise & just moved back after being away for a few years, so I've been an Idaho Power customer most of my life. When I moved back my partner & I purchased our 1st home. We were both so excited that it has a huge south-facing roof face with no tree coverage & would be perfect for having solar panels to help produce energy for our home & our community & over time, reduce our energy costs. But with the proposed new net-metering rate structure it seems that this may not be as real of a possibility anymore, since it would be more financially viable to have the panels on east - & west-facing roof faces (with hourly net-metering), which our house doesn't have. I'm disappointed & nervous about what this new net-metering structure will mean for people like me across Idaho Power's territory →

Print Name Lisa Young Sign Name L. J. 3

Address 2111 N 15th St. Phone Number (208) 841-8587

City and State Boise, ID Zip Code 83702

→ Who want to put solar panels on their roof & produce their own energy & help provide energy back to the grid. And I'm nervous for the solar companies & employees here in Idaho who are relying on this business for a living. This new net-metering structure objectively makes residential rooftop solar development a lot more difficult for Idaho Power customers.

★ I urge you to send the negotiating parties back to the table to reach a more fair agreement that won't do so much damage to this important energy industry in our state & will give customers the freedom to not only put solar panels on their roof but to make it financially viable for their families.

★ And open up the process to ensure that the voices, perspectives, & interests of affected parties are properly represented in those conversations & negotiations — including, of course, all the ~~voices~~ ^{testimonies} heard at the hearing tonight & submitted through this process.

★ And require further research & data by independent contractors on the costs/benefits of distributed solar generation to be used in this critical decision — since Idaho Power never conducted the study it said it would.

★ And I strongly urge you to grandfather current rooftop solar owners/~~producers~~ in & not force them on to any new rate structure that is agreed upon. They made those investments with the previous rate structure in mind & it would be utterly unfair to change that on them now after such massive investments & the benefits that they are providing to the grid in our communities.



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In Feb 2017

I invested \$25,000 in a 16-panel solar system for my house. The system would pay for itself in 10-15 years. With the new proposed net metering rates I might break-even in 30-year. At age 65, I might ~~be~~ be alive when this system breaks even.

I feel very strongly that I should be grand-fathered into the original agreement that we had with Idaho Power's net metering agreement. Anything less than that is stealing from me.

If Idaho Power can make 150% on every kWh that I give to them, How can this ~~be~~ be fair to any utility customer.

The garbage that Idaho Power is ~~giving~~ ^{giving} us for their reasoning of this change to the net metering agreement is ~~unbelievable~~ ^{unbelievable}.

How can IPUC approve anything that Idaho Power puts in front of the Commission ?? All they do is lie very well.

Print Name JACK VOSSEN Sign Name Jack Vossen

Address 7209 S Valley Heights Drive Phone Number 208-954-4249

City and State Boise, ID Zip Code 83709

If I PUC actually ^{grandfather's my system} ~~grants me~~ so Idaho Power ~~has~~ to
pay me the same rate as they charge their customers.

That is the only fair thing to do.



IDAHO PUBLIC
UTILITIES COMMISSION

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Boise, Idaho
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I am a 19 yr old student at Boise State University, and I have been very passionate about sustainable solutions to create a cleaner, better environment. There are a lot of different solutions to create a better environment, one is clean, renewable energy. I* want to do my part to sustain my future and the future of all Idahoans. I want to invest in solar panels, but ^(with the new proposal by Idaho power) ~~no longer~~ [^] ~~afford~~ nor my family, nor anyone in my entire neighborhood can ~~afford~~ no longer afford in investing in solar panels; nor can we ^{even consider it} in the future, if this goes ^{through.} This net metering program change desentives people of any financial situation and it inhibits and demotivates young people such as I who want to keep and better Idaho's

Print Name Cheyon Sheen Sign Name Cheyon Sheen

Address 2118 candlewood ave Phone Number 208 731 8923

City and State Twin Falls ID Zip Code 83301

environment. We all deserve a clean future to live in so that way maybe I too can be as old as these ~~old~~ retiring folks. However, if Idaho power decides to go back on their word and ~~profit~~ chooses to profit ^{more} instead by changing this net metering process, No one will invest in solar energy and then maybe, no, most likely I won't ever get as old. Maybe the only benefit of that is that I don't ever have to ~~get as~~ worry about paying off my solar panels when I retire. Idaho power is not just taking the investments of existing solar users, they are also taking our investment for our future. All I want is to make the environment better to live in for all Idahoans and I thought Idaho power wanted to do the same.



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Click on the "Case Comment Form" link

See
attached

Print Name

Alyson Rene Martin ID

Sign Name

Alyson Rene Martin

Address

3716 E Timbersaw Dr

Phone Number

208-484-3241

City and State

Boise, ID

Zip Code

83716

May 2019 – Mauna Loa Observatory in Hawaii – Carbon in the atmosphere was 414 ppm. It was 280 when the Industrial Revolution began in 1750. There has been a huge uptick in 2019. This is the highest level of greenhouse gases in our atmosphere in human history, higher than at any point in millions of years.

Our fossil fuel addiction is altering our atmosphere, endangering life on Earth.

Our denial and failure to address the problem has been a lost opportunity to fix it. We're at a point now where the best we can do is slow it down.

We need imminent action to reduce greenhouse gas emissions on all levels: Individual, corporations, government. Many individuals have stepped up to do what we can to reduce greenhouse gas emissions. That includes us solarizers. We saw the problem and put our money up to do our little part to solve it. We should be recognized for that effort, and if not celebrated, at least treated fairly.

But individual action is just not enough.

We need corporations to step up and take action. As our electric utility, Idaho Power is in a unique position to take meaningful action.

Most significantly, we need the power of government to understand the gravity of global warming and adopt effective policies to address it. The talking has been done. We need action NOW.

Solarizing is an effective way to reduce greenhouse gas emissions. Solarizing needs to be incentivized, not penalized. Idaho Public Utilities Commission, this is your chance to step up for the future by rejecting Idaho Power's backward plan to hobble solarizing in Idaho. The problem we face is more than money, than lifestyle, than convenience. It's about all life on Earth. Do the right thing.

Alyson Renee Martin, J.D.
3716 E Timbersaw Dr
Borser, ID 83716

Idaho Power customer, solarizer,
and climate activist

Diane Holt

From: Rob Conant <rob.w.conant@gmail.com>
Sent: Wednesday, December 4, 2019 9:25 AM
To: Diane Holt
Subject: Typo Corrected testimony
Attachments: RConant Solar Testimony 12-4-19.docx

Hi Diane,

I heard of the online comment deadline yesterday but was at the meeting until early this morning. I was able to submit my written testimony online after the meeting, but I did not have time to edit.

Here is a typo-corrected copy if needed. If possible, please include it instead of what I submitted late last night online.

Thanks,
Rob

My testimony delivered after midnight at the IPC-E-18-15 public hearing 12/3 - 12/4/19

Thank you, commissioners, for your patience to hear us. I am a professional electrical engineer. I have specialized in system design on this very campus for about a decade. We have a lot of onsite generation perspectives in this room. I am here to do my duty as a citizen, not mainly to represent the solar generation customers, who diligently could be here to speak for themselves. I have come with a perspective from the underrepresented 450,000 plus other Idaho power customers who were failed to be notified of any of this. They are after all the suggested beneficiaries of this change.

All my data and calculations are based on Idaho Power's (the company's) fixed cost report.

The company would like it to be apparent from their fixed cost report that they, are losing a large amount of money from on-site generation customers. At least when considering the factors that they wished to include. They would like it understood that this lost revenue is being born by the bulk of the non-generating residential customers. And have since justified this proposal in the name of rate fairness.

There are several other factors they did not include which more thorough net-metering study would have, including numerous deferred costs and solar benefits they fail to assign value to. Solar mainly generates during the summer, and the company has self-proclaimed "higher costing summer months", on page 32.

While multiple scenarios were considered in their report, the actual benefit to Idaho non-generating residents (schedule 1) of net hourly billing was not discussed at all in the 91-page fixed cost study. So, I have been compelled to determine from their own data what this benefit might be.

As an important aside, the company is using incorrect language in their public correspondence. The company's letter to the public stated "more accurate measuring" as the issue being addressed in this case. accurate measuring, who could argue with that? they don't mention. That accurate hourly measuring is already occurring and has for 5-10 years with the distribution of smart meters and any customer can login online and see accurate hourly measuring, their utilization and upload to the grid.

I urge the commission to require Idaho power to use the correct terminology with all the negative PR it may incur, this is about residential solar carryovers and billing methodology. The term measurement is misleading to the public and you will see that is not the terminology the company chose to use in their report.

As a result of my personal analysis of their report there are two points I would like to make to the commission regarding logical and mathematical problems with the study and the proposed settlement agreement.

Point 1:

The company is proposing this change in the name of rate fairness. They would, like those who incur the costs (at least as they would like to calculate them), to pay the costs. But strangely, from the companies own figure 1, page 15: (the residential generation customers are not the ones you should be targeting. There exists much vaster misalignment of distribution of fixed cost dollars

within the schedule 1 residential (non-onsite) customer class itself. Because the company has failed to address the main fixed cost issues.

Not discussed by the company is fixed cost report is the large discrepancy between who paying for those fixed costs and who is actually incurring those fixed costs. And I'm not talking about solar generation, I'm talking about the bulk of schedule 1 residential customers not billed appropriately amongst each other for fixed costs, per the company's own report. The examples are not hard to consider, someone with a low scale constant (high accumulated) electric load is bearing the fixed costs, imposed by someone with little overall energy usage, but patterns which drives up the real costs of peak load and time of use generation and infrastructure costs.

Also, there are also 430 times more of those regular customers than onsite generation customers. I would ask the company Why are we not proposing properly assigning the vast majority of fixed costs within schedule 1?

If we are truly pursuing fixed cost fairness amongst schedule 1 (by the way this is the proposed goal), wouldn't it make sense to address 99.8% of the group impacted by the problem, not only the 0.2% who are on-site residential customers? Why are you discriminating against residential on-site generation, saying *they have to pay their proper share of fixed costs*, but no one else? No other schedules were included at all.

This leads to the most blatant issue with the company's study.

Point 2:

This regards the dollar amounts involved, you have-to follow the money. I examined the company's revenue surplus/deficiency numbers. They are clear. And with the company I must agree they are overcharging residential customers based on their data, by 19 million per year, (page 14), or on average 60 dollars per customer. But who is getting the benefit of this overcharging by 19 million? The company makes it sound like it is the residential solar producers, as this is the only party whom the company is targeting with this regulation.

Yet even according to their math, only 2.6% (0.5M\$) is due to residential solar. If the company is overcharging residents by 19 million, who is the other 18.5 million subsidising if it is not going to residential solar? It is the Large General, Industrial and Irrigation customers who are not paying their fair share of costs, burdening the residents in schedule 1, and if you consider the service charge schedules 06 and 08 pay, perhaps them as well.

Page 14, figure 6, in the report summarizes that this discussion should not merely be about a minor 0.5M\$. We should be addressing the 31 million, 60 times as much as Idaho power is considering addressing, though they have had this data for two years.

If we even achieved billing onsite generators perfectly fairly, based on the company's own numbers, the commission would save the average schedule 1 customer, over the course of an entire year, 1\$. (The math is not hard - *half a million \$ recuperated to about as many customers*)

I ask the commission, why are we not discussing saving schedule 01 the full \$60 a year? Let's have candid discussion about the 20,000 irrigation, large general, and industrial customers who are causing 97.4%, almost the entire the schedule 1 over-charge, totalling 31M\$, and get that back to schedule 01 customers.

The real picture:

In WWII we parachuted rubber dummies into enemy territory so they would spend their limited ammunition fighting a harmless target while we came in under the radar somewhere else.

The company is wasting the commissions and the public's time targeting the wrong group. I would urge you, commission to focus your resources on the actual cost burden to Idaho residential overbilling. Why are we wasting years targeting residential generation, Individual homeowners, who account for only 2.6% of the amount you are overcharging other residential customers?

I'm not surprised that the public views this as predatory by the company, for squashing the schedules 06 and 08 because they encroached on their power generation monopoly.

Here today we are discussing how to punish 0.2%, or two out of a thousand customers, for faulty rate structures that fail to account for fixed costs properly for 100% of the entire half a million residential customers. On your rate fairness quest, why target initial change towards the two smallest schedule groups both in numbers and dollar impact? Why is the company discriminating in this way? Something the commission has forbidden. One of the only conclusions the consumer can make is they are targeted because they don't have corporations behind them.

I note among the solar community:

- Alignment with federal and state goals of advancing clean energy
- personal investment in the technology of the future
- personal investment in the clean future of our world
- the lack of taking a single cent of a pay check from their investment, only future deferred costs based on responsible calculations based on *your prior policy*.

Should not they rather be the target of your *support*, having fully cooperated with every regulation and safety protocol you have issued. In fact, they have born additional cost to their solar systems in order to meet safety and regulation standards. Are they some sort of law violators?

And yet, the company sent misleading statements like desiring the "accurate measuring". They should have been honest and said, "lucrative billing for Idaho Power to the detriment of prior green energy competition in Idaho". **Idaho Power's proposal has a clear goal to remove decades of previously agreed upon green energy incentives to a few. While promoting their "pro-green" face to the public, they continue to overcharge that same public tens of millions, while subsidising literally power-hungry industrial bottom lines.**

Should not hourly billing be marketed as it is, merely a way to target and discourage residential solar customers in an unprecedented way? Why are they not including irrigation (schedule 24), Large General Service (schedule 9)? This is discriminatory.

In this regulation proposal, the company would like to discourage small small installations and for inappropriate reasons. This is based on data from their own report. Their own summary language focuses on classes 06 and 08 (a mere 2.4% their problem) as "especially a problem" (pg. 15). I ask why is 2.6% of this billing issue "especially a problem" while 97.4% is not mentioned at all?

I agree that reform is needed, but if approved, you are targeting the wrong group with this regulation. If power providing parties like Idaho power are guaranteed a roughly 7% profit on their work, why are the truly green, proactive, smaller, more risk exposed, and personally invested homeowners in Idaho not worthy of similar consideration? Simply because they don't have millions of stakeholders holding stock certificates or sitting across the board room?

The only personal comment that I would make is that My residential solar stakeholders are ages 4, 7, and 11, and sit across the dinner table from me. And at some point, I'm also here to represent them. They are currently excited about clean energy with open minds and future careers defined by pride in our household's caring well for our limited community resources. They are smart and will hear about and reference this moment, as thousands of children will. They are looking to us all to be examples of justice. I also represent you, because you likely also fall into one of these two categories, schedule 01 or 06.

The company would suggest that solar generators are to be treated as a *power wholesalers*, and yet denied that their solar installation is able to pay for itself, or any profit. *Reasonable* would be guaranteeing the same 6.8% that the Idaho power is guaranteed and granted depreciation and other tax incentives that all businesses are provided by federal law. This is of course, a ridiculous proposal. There is an overly complicated legal mess that would ensue, if we approve this, making every household a power business. With future technology, as Idaho power knows, all households will have low barriers to producing energy in a couple decades in some form, if they still own the sun that shines on their house. This proposal is further distracting from the real source of fixed cost inequality in Idaho. Let's stay focussed, and do our jobs, and force Idaho power to address the broader fairness issues.

We are years into this discussion, and the company pressuring for quick regulation. It is time we start talking about a fair solution. Why would the so-called beneficiaries of this change not be invited? If they came and actually did the math, this is not the change they would want, because it does not begin to address their needs. This begs the question of who is this change targeted to benefit, if not for the schedule 1 customer benefit (of 1\$)? At the end of my analysis, I can only conclude this is about Idaho power controlling the future of household energy generation, nothing more, nothing less. The higher the percentage of energy they control, the more dollars of revenue they receive, at their guaranteed rate of return, the larger dollar amount of profit they accumulate.

To close, if you are for clean energy? Why punish it? Punishing these 0.2% of the residents does not even begin to grant the other 450,000 fairness.

This is a lie that we are being sold, and the math is clear. If you are for rate fairness then lets actually pursue it, instead of straining out a 0.5M\$ gnat and swallowing a 31M\$ camel.