



McFARLAND RITTER

3 December 2019

VIA EMAIL: diane.hanian@puc.idaho.gov

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

Re: Case No. IPC-E-18-15

Public Utilities Commission,

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

Facts.

1. I entered into a contract to construct a rooftop solar system at my home located at 1675 E. Picabo Ct., Boise, Idaho 83716 in June 2018. The solar system cost more than \$36,000.00.
2. Based on the monthly net metering structure in place at the time of the installation of my system (and still in place today), I expected to recoup the cost of that system by end of year 2028.
3. My solar production system was completed on or about August 23, 2018, and I received a "System is Ready" email from Idaho Power on that day. That email states, "Tariff schedules (including rates and system requirements) are subject to change with approval from the Commissions."

Reasons.

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

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

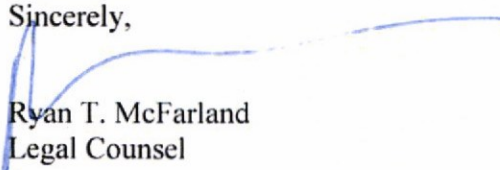
In short, my financial decision was made in reliance on the structure of monthly net metering, and this structural change (not merely a rate change) will prolong, and perhaps entirely undermine, my investment. Idaho Power's net metering structure was critical to a series of financial decisions, and now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

2. **Takings.** Should I be forced into the new hourly net metering structure, I believe I will be subject to a regulatory takings – to the benefit of Idaho Power.
3. **Insufficient Evidence.** The preamble of the proposed Settlement Agreement states that Idaho Power “requested, and the . . . Commission . . . ordered, a follow-on docket to comprehensively study the costs and benefits of on-site generation on the Company's system,” and that the “Commission directed the Parties to confer.” Further, Section IV(C) states that “The methodology to determine [the environmental benefits of distributed on-site generation systems] is not part of this settlement Agreement. . .” It appears that the Parties did confer, but that no study of the environmental or financial effects of rooftop solar systems has ever been conducted – or, if it has, that study has not been published. It seems patently unfair to upend the net metering system on which I have relied to the benefit of Idaho Power, at my expense, when the costs and benefits of my rooftop solar system to the Company any other Idaho Power users has not been adequately studied. Studies outside of Idaho suggest that rooftop solar systems have a net positive effect on all users:
<https://www.brookings.edu/research/rooftop-solar-net-metering-is-a-net-benefit/>.

Idaho law requires utility decisions to be “just and reasonable,” (I.C. 61-303, 61-315) and the Idaho Supreme Court has said such decisions cannot be just and reasonable unless based on “competent, substantial evidence.” Application of Pac. Tel. & Tel. Co., 71 Idaho 476, 480, 233 P.2d 1024, 1026 (1951). In the absence of the PUC-ordered study, or other evidence justifying the new net metering system, placing me (an existing customer) into it would not be just or reasonable.

Conclusion. The proposed settlement was drafted without a comprehensive study, without sufficient evidence to support it, and without my involvement. If I am not permitted to remain in the net monthly metering system that I invested in, I will be unjustly deprived of my property. I request that I, as an existing net metering customer, be permitted to continue to receive the benefits of the program I – literally – bought into.

Sincerely,


Ryan T. McFarland
Legal Counsel

Diane Holt

From: rob.w.conant@gmail.com
Sent: Wednesday, December 4, 2019 1:44 AM
To: Diane Holt
Subject: Case Comment Form: Robert Conant

Name: Robert Conant
Case Number: IPC-E-18-15
Email: rob.w.conant@gmail.com
Telephone: 208-559-5719
Address: 4960 N Farrow St
Boise ID, 83713

Name of Utility Company: Idaho Power

Comment: My testimony as delivered tonight, actually early this morning at the meeting 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 the companies 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 a number of 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. Such as mainly generating during the summer (their self-proclaimed "higher costing summer months", page 32).

While multiple scenarios were considered in their report, the actual benefit to Idaho non-generating residents 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 addressed, and I quote, "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 company's own figure 1, page 15: (the residential generation customers are not the ones you should be targeting. There exists much more vast 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 in its fixed cost report is the large discrepancy between who is 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 drive 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 on-site generation, saying they HAVE TO pay their proper share of fixed costs, but no one else? No other schedules 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.

But only half a million (2.6%) is due to residential solar. Even according to their math. If the company is overcharging residents by 19 million, who is the other 18.5 million subsidizing? This 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 them 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 31 million, and get that back to schedule 1 customers.

In WWII we dropped rubber dummies in enemy territory so they would spend their limited ammunition fighting a harmless target.

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 ANY of the half a million residential customers. Why target initial change towards the two smallest schedule groups both in numbers and dollar impact on your rate fairness quest? Why is the company discriminating in this way? Something you have forbidden. One of the only conclusions the consumer can make is they are targeted because they don't have corporations behind them.

As an analyst of the solar community I see:

- 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
- while not taking a single cent of a paycheck from our 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 bore additional cost to their solar systems in order to meet regulation? 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 vast public, while they continue to overcharge that same public tens of millions, while subsidizing the much more literally power hungry industry 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 the regulation proposal, the company would like to discourage future solar 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. Why is 2.6% of the companies billing issue "especially a problem" while 97.4% is not being mentioned at all here?

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, 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 households caring well for our limited community resources. They are smart and hear about and reference this moment, as thousands of children will. They are looking to us all to be examples of justice. I know you, like I, fall into one of these two categories, schedule 1 or 6.

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. Every household 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. There is an overly complicated legal mess that would ensue, if we approve this, making every household a power business. This would be further distracting from the real source of fixed cost inequality in Idaho. Lets stay focussed, and do our jobs and force Idaho power to address the broader fairness issues.

With years into the 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? Because if they came and actually did the math, this is not the change they would want, it does not begin to address their needs. This begs the question of who is this change representing? Really, if not for schedule 1 benefit (a dollar?)?

At the end of my analysis, Who is this for? 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, the larger dollar amount profit they have at their guaranteed rate of return.

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.

Unique Identifier: 164.165.206.42

Diane Holt

From: tom_michaelson@hotmail.com
Sent: Tuesday, December 3, 2019 3:40 PM
To: Diane Holt
Subject: Case Comment Form: Tom and Becky Michaelson

Name: Tom and Becky Michaelson
Case Number: IPC-E-18-15
Email: tom_michaelson@hotmail.com
Telephone: 8316767900
Address:
Nampa Id, 83686

Name of Utility Company: Idaho Power
Comment: The Commission should uphold the original program that was agreed upon by Idaho Power and solar customers.

Idaho Power should not be allowed to make a profit on the backs of unfairly treated solar customers.

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.

Unique Identifier: 164.165.206.42

Diane Holt

From: dmmonsees@gmail.com
Sent: Tuesday, December 3, 2019 3:55 PM
To: Diane Holt
Subject: Case Comment Form: David Monsees

Name: David Monsees
Case Number: IPC-E-18-15
Email: dmmonsees@gmail.com
Telephone: 202-669-6431
Address: 1347 W Parkhill Drive
Boise Idaho, 83702-1350

Name of Utility Company: Idaho Power

Comment: The proposed settlement is nothing more than a thinly disguised attempt by Idaho Power (IP) to continue their long battle against distributed electricity generation based on renewables, especially sun and wind. They first stood firm in favor of coal and now continue to promote gas, even when they know that these short-term gains will lead to long-term losses. Their approach to using fossil fuels is the driver behind the sixth great extinction, an extinction that may well include man. The planet we know today is the victim of companies like Idaho Power. The blizzards, wildfires, flooding and droughts are well known to be in large part a result of our failure to use sustainable power sources.

The proposed settlement violates requirements of IPUC Order No. 34046 in Case No. IPC-E-17-13 that called for a publicized cost-benefit analysis of IP's on-site generation system. This analysis, if done, has not been released. The IPUC must carefully determine that the figures in that analysis are correct and fair, including, as required, all net metering customers or other constituent investors in on-site solar power generation.

IP does not need the money they wish to obtain by raising net metering rates. If they do need money, they might instead forgo the obscene raises and bonuses not truly earned by their executives. They might also stop spending huge sums on donations to Idaho's politicians. While use of these monies is constrained and legal, it remains that this is a thinly disguised bribe giving politicians funds to defeat IP's opponents in elections and to pay their dues to their political party. This eases politicians' pain of spending half their day fundraising. In one year, Governor Otter received not only his annual gift of \$5000 from IP, but also received similarly large donations from Mr. Anderson and other IP executives. This largess is possible because of the conflicts of interest among well-paid members of the IDACORP board, and the fact that green or renewable energy is not considered when awarding raises and bonuses.

This system is broken. In today's world, an IP monopoly is no longer necessary. The environment has and is changing to the point that old practices cannot be allowed if this earth is to survive.

Thank you,

Dr. David Monsees
1347 Parkhill Drive
Boise, ID 83702

Unique Identifier: 164.165.206.42

Diane Holt

From: pricebr@tfsd.org
Sent: Tuesday, December 3, 2019 3:57 PM
To: Diane Holt
Subject: Case Comment Form: Bruce Price

Name: Bruce Price
Case Number: IPC-E-18-15
Email: pricebr@tfsd.org
Telephone: 2088632518
Address: 1016 Toxaway Circle
Twin Falls ID, 83301

Name of Utility Company: Idaho Power
Comment: Good morning,

Thank you, thank you for being one of the few power companies in the United States that is trying to create a power grid that does not include coal and methane gas as its primary source of generating electricity. Thank you for being a leader in the idea for the average person considering using less energy by educating the population of Idaho in your clean/green energy solutions in our homes. Thank you for giving an incentive to Idaho farmers to reduce their energy usage by turning off their irrigation pumps at peak times during the summer days and also indirectly teaching farmers that watering during the peak electrical hours is also a poor method of irrigation as the summer heat evaporates a substantial amount of irrigation water. Thank you for being one of the power companies that does not have a nuclear power plant built within your grid. Thank you for being reliable for me and my families heating in the winter, cooling in the summer, lights, a cold refrigerator with cold beer, and for the other first world problems we have here in Idaho because of the power you provide. Thanks you for leading in the technology advancements that electricity needs to make to keep everyone around save. Thank you for all of the linemen that risk their lives and spend numerous hours fixing power poles, such as the twenty plus power lines that went down near Jerome, Idaho in November. Your company is reliable and dependable when compared to the other power companies in Idaho. Thank you for providing an incentive for electricity and power consumers to change. The incentive that your company provided have allowed numerous electricity consumers change how they think about their energy consumption, has provided numerous new business opportunities, and most importantly improves your measurement of being a green company.

Having solar installed on my house was not only a green/environmental, but an economic decision. But let us take a moment to discuss Idaho Power and its history of economic decisions.

Idaho Power infrastructure, including dams and hydroelectric plants and wind turbines have been funded by other numerous other entities such as the federal government, including the Bureau of Reclamation, Army Corps of Engineers, state government, and private business and corporations like British Petroleum. The infrastructure that you now own and maintain has been built through numerous federal and state funding projects, which are and have been great for the economy in Idaho and will continue to fuel the economic growth of our state. Idaho is in the middle of the next economic growth phase, which was spurred by Idaho Power, the solar movement. With numerous solar companies moving into our state and being started within our state by local entrepreneurs, the economic growth will fill the 25% void of Idaho Power's movement away from coal and natural gas fuel as a means to produce energy. The incentive to place solar on our roofs is the driving force to make a change in the future and to fill your void of electricity coal and natural gas produced in our state today. Thank you for becoming a carbon free company and let the consumers produce the next phase of infrastructure for Idaho Power.

In Idaho Power's quest to become carbon free, I have seen numerous commercials and advertisements promoting green technology and green habits. In these commercials, Idaho Power promotes ways to lower household electricity demands, such as changing lights to LED, adding a lid while cooking to retain heat, and turning down the thermostat during the winter to lower energy costs and bills. All of these are a start, and yet as soon as my family put solar panels on our roof, the power and energy savings created by your incentives, change my outlook and my family habits. All of us in our home now demand that we make sure we change the lights to LED, we are using less energy by turning off lights to areas we are not using, the thermostat is now controlled by a central system that knows when we are home and we use the heat/cooling systems only when we are at home. We have changed, we are actually practicing conservation and the cause is the incentive to maintain our incoming solar through energy conservation. Solar and the incentive to save on our \$100.00-200.00 Idaho Power bill has caused a change in our home, for the better.

There was a story in the New York Times that discusses how Idaho Power has paid farmers since 2004 to turn off their irrigation pumps during electrical peak hours and of course the farmers agreed. They agreed because you give them a financial incentive. The same is true for those households using electricity during peak hours, Idaho Power give them an incentive to turn off their thermostats while they were not at home during those peak hours. Idaho Power has created a business model of spurring change and the solar panels installed on my home was Idaho Power new incentive, equal price for kwh coming in as going out. "With the right incentives, people can and will modify their behavior in ways that are beneficial," LaMont Keen, the C.E.O. of Idaho Power Thank you for keeping the incentive to go green and making this beneficial to those households and businesses that want to add to the grid.

Please consider keeping the contract we signed together and agreed to in April the same. The power we generate should cost you the same as the power you generate.....I am going to keep up the infrastructure on my side of the electrical panel, while you can keep up the infrastructure on your side of the electrical panel. The people that are not generating power should pay more to offset the costs on your side of the infrastructure, as they are more reliant on it than those who have chosen solar. As discussed earlier, some of the cost of your original infrastructure was not paid for by Idaho Power. At minimum, I would want my children to uphold their end of contract or agreement, even if they didn't like the results later. I would hope the narrative changes for my children and they do not think of Idaho Power as the quote from the New York Times, "IDAHO POWER has been used to getting its way: it's an old joke around Boise that Idaho is the only state named for a power company." Use your influence for the benefit of all, let the new solar infrastructure help with the grid a peak times, but let us have the incentive of generating power at an equal cost, let small business installing and maintaining solar grow the economy, let the coal and natural gas plants can be a source of energy from the past, and uphold your agreement on our contract together, be the business model of change and inspiration, change the narrative of energy production and profit, this is the new way.

Remember, The Sears and Roebuck catalog was once the way to buy items, Amazon changed the business model of how to do things.

B. J. Price
Twin Falls High School
Biology Department
1016 Toxaway Circle
Twin Falls, Idaho 83301

Diane Holt

From: johnlharry@msn.com
Sent: Tuesday, December 3, 2019 3:58 PM
To: Diane Holt
Subject: Case Comment Form: John Harry

Name: John Harry
Case Number: IPC-E-18-15
Email: johnlharry@msn.com
Telephone:
Address: 1452 W. Powder Ct.
Eagle Idaho, 83616

Name of Utility Company: Idaho Power

Comment: I understand Idaho Power is seeking to drastically change the amount it is paying for solar power customers with net metering. Neither the Commission nor Idaho Power set the initial net metering system up in a vacuum. We made the financial decision to add solar power to our house based on the rules set up by you both. We have a lot of money invested in this system. We only have a limited time to pay for the system. Our lives are not infinite like a Corporation that will go on forever. If you must change the rules make it for future solar customers who can then decide based on the new rates, or cap net metering as a percentage of total customers.

I understand Idaho Power says everyone needs to pay for the grid. I agree with this. Possibly the cost of the grid should be a separate line item on the utility bill. But then shouldn't Idaho Power pay something for my grid, my infrastructure. We (solar net metering) are part of the grid now. After all I am producing the most electricity when Idaho Power needs it the most. We have invested in the grid, because of this Idaho Power is spending less on infrastructure and maintenance.

One of the main reasons for net metering, among many other things, was to eliminate the need for an additional coal fired plant or to eliminate one. We are helping to do this. Please don't punish us for stepping up with a very substantial financial investment that, with current rates, will still take about 12 years to pay off.

If the PUC decides to reduce the rate Idaho power pays for the electricity I produce I will be taking a loss with no possible way to recoup. The PUC guarantees Idaho Power make a profit. Maybe this should change too.

Thank you for your consideration.

John Harry

Unique Identifier: 164.165.206.42

Diane Holt

From: tmccauley@gmail.com
Sent: Tuesday, December 3, 2019 4:01 PM
To: Diane Holt
Subject: Case Comment Form: Todd McCauley

Name: Todd McCauley
Case Number: ipc-e-18-15
Email: tmccauley@gmail.com
Telephone:
Address: 3155 W State
Eagle ID, 83616

Name of Utility Company: Idaho Power

Comment: I would like to express my disapproval of the proposed solar policy. It amounts to a decrease in credit for power we generate. We spent over \$100,000 for our system with the expectation that this would have a pre-determined payback period. We feel it is unfair to change the rates on pre-existing solar installations. We feel that if changes must be made to the existing credit rates, at the very least, systems installed prior to the rate change should be grandfathered in and keep their old rates. Ideally, the solar power credits should be applied at the same rate they are charged. This seems the fairest way because with the proposed rate change, we are generating electricity on our investment that is profiting Idaho Power while only partially compensating us. Thank you!

Unique Identifier: 164.165.206.42

Diane Holt

From: greg.lonnon@gmail.com
Sent: Tuesday, December 3, 2019 4:07 PM
To: Diane Holt
Subject: Case Comment Form: GREGORY LONNON

Name: GREGORY LONNON
Case Number: IPC-E-18-15
Email: greg.lonnon@gmail.com
Telephone: 2082846741
Address: 747 E. Highland View Dr
Boise ID, 83702

Name of Utility Company: Idaho Power

Comment: I believe we need to keep reasonable incentives in place to help grow green power production. Please do not increase fees for residential solar usage.

Unique Identifier: 164.165.206.42

From:
Philip J. Neville

To:
Idaho Public Utilities Commission

RE: Case Number IPC-E-18-15
On Site Electric Power generation settlement agreement on net metering.

Dear Sirs:

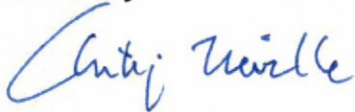
I am an Idaho Power residential customer with a state of the art rooftop solar power installation for on site generation. This system was installed about a year ago. Idaho Power inspected and approved the system. Like many other residents of Idaho, I had been concerned about the air pollution involved in production of energy from fossil fuels and decided to do my part to reduce dependency on such polluting fuels.

I studied the history, costs and benefits of residential solar power and reviewed the installation costs with Auric Solar of Meridian, ID. I analyzed the projected energy savings from the specific residential installation at my home and understood that the installation would likely not pay off during the life expectancy of the solar panel installation. Nevertheless I went forward hoping to do my part to reduce the amount of fossil fuel generated power I would consume and reduce my electric power bills.

As I review the proposed changes being considered by the ID PUC, I see that the changes would reduce the price Idaho Power pays to solar customers for solar generated power. Changing the rules that existed for net metering when current

customers signed up would be harmful to those of us that previously invested in solar equipment. It makes no sense to lower the price Idaho Power pays for power going forward when the price charged by Idaho Power tends to increase over time. Oddly, such customer generated power can be viewed as a windfall to Idaho Power, which need rely only on already existing infrastructure, and did not require major new investment, to receive the power. Such existing infrastructure is used not only to to sell and distribute their power to current residential customers. Idaho Power uses those same lines to purchase clean power from small customer / providers. Additionally I paid a \$100 fee to Idaho Power as part of their application process in order to have this arrangement. It is disappointing if not unethical for Idaho Power to change the rules and reduce the compensation to families and businesses who made the investment in good faith.

Sincerely

A handwritten signature in blue ink, appearing to read "Philip Neville".

Philip Neville

3300 W. KOOTENAI ST
BOISE, ID. 83705

Diane Holt

From: jpage422@gmail.com
Sent: Tuesday, December 3, 2019 4:17 PM
To: Diane Holt
Subject: Case Comment Form: Julia Page

Name: Julia Page
Case Number: ICP-E-18-15
Email: jpage422@gmail.com
Telephone:
Address:
Boise ID, 83702

Name of Utility Company: Idaho Power Company

Comment: We are existing net metering customers. Our system was designed on the basis of our needs and the net metering policies available at the time and installed on our house in the spring of 2017. We anticipate that the system will pay back our investment over the next 15 years or so. Beyond that, we are pleased to be able to generate power for ourselves and provide any extra to the grid. We do not think it is appropriate to apply the conditions of the settlement agreement to existing solar customers, especially the part about cutting in half (approximately, over time) the amount credited to us for power we provide to the grid. Our calculations for system design and payback would be turned upside down if these new rates apply.

Aside from my strong feeling that existing rooftop solar systems should not be subject to this new order, I don't believe Idaho Power should be recommending new rates without having completed the study of the costs and benefits of distributed generation they were asked to do in a prior order. I find it hard to believe that rooftop solar costs Idaho Power money. If that's the case, I want to see and understand how that occurs. How can rates be set without such a study?

I am glad Idaho Power has committed to supplying 100% clean energy by 2045. I believe it is in the public interest to do everything we can to lessen our use of fossil fuels. This new order makes it harder to achieve that goal by making an investment in rooftop solar much more difficult to ever pay off. This is backward in terms of achieving a clean energy goal. It will hurt installers and diminish the economic impact of their work in Idaho.

Also, I know there are a number of people who have already committed to installing solar on their homes but whose systems haven't been finished yet. These folks also made their calculations based on the existing price structure. It would be unfair to penalize them by changing the rules in the middle of the game. If they've signed their contract, they should be grandfathered in. As I understand it, even including these new people whose systems are not online yet, there are still only a relatively small number of rooftop solar systems throughout the whole Idaho Power system. Hurting new dispersed generation customers is not necessary. Idaho Power will not give much up by leaving them out of the new rate structure.

Thanks for the opportunity to comment.

Unique Identifier: 164.165.206.42

Diane Holt

From: chadnworth@gmail.com
Sent: Tuesday, December 3, 2019 4:19 PM
To: Diane Holt
Subject: Case Comment Form: Chad Worth

Name: Chad Worth
Case Number: IPC-E-18-15
Email: chadnworth@gmail.com
Telephone: 208-557-9578
Address: 1621 W Hays St
Boise ID, 83702

Name of Utility Company: Idaho Power

Comment: My name is Chad Worth. I work as an engineer for a national clean energy consulting firm and also serve on the board of the Snake River Alliance, Idaho's nuclear watchdog and clean energy advocate. I helped launch the Solarize the Valley program in 2016, 2017 and 2018, helping over 125 families across southwest Idaho go solar. These comments represent my own personal comments. While I'm not pleased with the outcome of the current NEM proposal, I appreciate the extensive work completed by Idaho Power, the PUC and the many energy advocates over the last year.

I strongly encourage the Idaho PUC to require Idaho Power to "grandfather" the existing ~4,000 NEM customers (and all those who invest in solar prior to this decision becoming final) for a period of 20 years under the current retail NEM structure. These Idaho families and businesses have collectively invested millions of dollars into Idaho's clean energy economy, helping provide cleaner air for Idahoans and a more resilient electric system for Idaho Power. While it's true that rates for NEM customers were never guaranteed to not change, it is impossible to expect homeowners and businesses to make a multi-decade investment decision on anything but the existing NEM structure. Maintaining the "retail" structure for existing solar customers for a period of 20 years is fair, easy to administer for Idaho Power and has negligible impacts on non-NEM ratepayers. Excess generation compensation and grandfathering issues are not unique to Idaho as many state PUCs and utilities have dealt with these various NEM issues across the country in recent years. In late 2015, Nevada state regulators switched existing NEM customers to a low, wholesale-type rate for excess power consumption. There were both significant layoffs of solar workers statewide and significant political backlash in the following years' election. In short, our neighbors to the south have shown us what can happen decisions are made by regulators and utilities that needlessly upend existing solar investments. Nevada eventually reversed course, and Idaho should learn from their experience.

In summary, I strongly encourage the Idaho PUC to require Idaho Power to grandfather all existing NEM customers at the time of the final decision under the current NEM retail rate structure for a period of 20 years. Thank you.

Unique Identifier: 164.165.206.42

Diane Holt

From: juliedagostino@gmail.com
Sent: Tuesday, December 3, 2019 4:19 PM
To: Diane Holt
Subject: Case Comment Form: Julie DAgostino

Name: Julie DAgostino
Case Number: IPC-E-18-15
Email: juliedagostino@gmail.com
Telephone:
Address: PO Box 2144
Boise ID, 83701

Name of Utility Company: Idaho Power Co.

Comment: I oppose the effort to cut by 50%, the price paid for power generated by the 4000+ solar owners in Idaho.

Unique Identifier: 164.165.206.42

Diane Holt

From: b4dhaza@gmail.com
Sent: Tuesday, December 3, 2019 4:30 PM
To: Diane Holt
Subject: Case Comment Form: Barbara Forderhase

Name: Barbara Forderhase
Case Number: IPC-E-18-15
Email: b4dhaza@gmail.com
Telephone: 208-433-9548
Address: 2157 E Walling Drive
Boise ID, 83712

Name of Utility Company: Idaho Power

Comment: Changes in Idaho Power's Net Metering – IPC-E-18-15

Dec 3, 2019

I am currently in the process of getting solar panels for my home. I signed a contract with Auric Energy on October 18, 2019 and got financing shortly thereafter. Using the Federal tax credit, I'm also replacing a 20+ year-old roof. My system will probably go "live" by the end of December.

I had heard rumors of Idaho Power seeking approval of a new net metering program from the Idaho PUC but was not aware of the details or timeline. Had I known how close the decision was to being decided, I wouldn't have moved forward with going solar. The issue was brought to my attention at the end of October, after I signed the contract.

As a single person household, my energy needs are not large. I have line dried my clothes for years. This was not just to save money but to reduce my energy consumption and to do my small part to fight climate change. My investment in solar was to be a responsible citizen in creating clean energy, not just for myself, but for others. Idaho Power's jump into large solar farms is a new development.

The solar system being installed on my house is the smallest allowed. Based on my historic energy use, Auric estimated that my system would create 115% of my energy needs. At first that bothered me, but then I thought – others can't afford solar systems and I would be creating clean energy that would be used by others.

I liked the idea that I would get credit for my solar power at the same rate as Idaho Power charges customers- even though I'd probably never use the credits. I've even thought I should increase my energy use to try to break even. Then with the new net metering system I would eventually get only 50% of the value of the energy I create. On top of that, with the Net Hourly Metering I would see an even lower return on my investment. So... financially my investment would be at a huge loss for me and Idaho Power would reap a huge gain.

When the Idaho PUC granted permission to Idaho Power to separate residential and small business net metering customers into different classes, the IPUC also directed Idaho Power to conduct a comprehensive study of the costs and benefits of net metering on Idaho Power's system to determine a proper rate structure of excess energy generation. My understanding is that this comprehensive study has not been completed. It is only fair to existing and potentially new solar customers that this study be completed before new net metering rates go into effect.

The Brookings Institution supports that concept – "Net metering — contra the Nevada decision — frequently benefits all ratepayers when all costs and benefits are accounted for, which is a finding state public utility commissions, or PUCs, need to take seriously as the fight over net metering rages in states..."

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

"From the state PUCs' perspective, until broad changes are made to the increasingly outdated and ineffective standard utility business model, which is built largely around selling increasing amounts of electricity, net-metering policies should be viewed as an important tool for encouraging the integration of renewable energy into states' energy portfolios as part of the transition beyond fossil fuels. To that end, progressive regulators should explore and implement reforms that arrive at more beneficial and equitable rate designs that do not prevent solar expansion in their states."

The article continues with suggested reforms.

<https://www.brookings.edu/research/rooftop-solar-net-metering-is-a-net-benefit/>

I sincerely hope that if the Idaho PUC does approve Idaho Power's new net metering program that individuals and businesses that have already invested in solar panels will be exempt from the change. Each of us invested in our systems based on the current net metering program. In my case where my system isn't "live" yet... there was no approval for the new net metering when I decided to go solar. Protect the private investments of individuals.

Protection of our investment also includes protecting the existing systems as part of the house. When a house is sold, the existing new metering program should transfer to the new homeowners. One selling point a solar company made to me was the increased value of my home when I sell it in the future, based on the solar system.

Protection of the warranty on our solar systems is another issue. A new net metering program may very well reduce the demand for home solar systems putting existing solar companies out of business. Who would repair it if my solar company goes out of business?

Sincerely,

Barbara Forderhase

Unique Identifier: 164.165.206.42

Diane Holt

From: diaalt@hotmail.com
Sent: Tuesday, December 3, 2019 4:41 PM
To: Diane Holt
Subject: Case Comment Form: Dia Crevier

Name: Dia Crevier
Case Number: IPC-E-18-15
Email: diaalt@hotmail.com
Telephone: 2089008093
Address: 2645 East Hampshire Court
Eagle ID, 83616

Name of Utility Company: Idaho Power

Comment: Idaho power needs to honor the agreements made when we invested our money into solar. This proposed pay change seems like Idaho Power wants to penalize us for going Green. Which baffles me, because they are still making a profit from our connection fees and they make a profit from our surplus.

Unique Identifier: 164.165.206.42

Diane Holt

From: amyssecondmail@gmail.com
Sent: Tuesday, December 3, 2019 4:50 PM
To: Diane Holt
Subject: Case Comment Form: Amy Taivalkoki

Name: Amy Taivalkoki
Case Number:
Email: amyssecondmail@gmail.com
Telephone:
Address: 1133 E Washington St
Boise ID, 83712

Name of Utility Company: idaho Power

Comment: Regarding the proposed net metering change to be netted on an hourly basis instead of monthly. I have experience with solar and we all know that ideally it should be netted up annually except for maybe on the equator.

The idea of truing up every hour is such a convoluted way of trying to get more money out of solar system owners. If the rational is that solar owners do not pay their fair share of the grid because they are using so little power when netted monthly, I would ask how does that compare to someone who is super efficient and careful with their electricity usage? Are they paying their fair share? Just because a customer has a solar system does not mean that they are using less power than a careful neighbor. The solar owner could have an electric hot tub, or space heater, that even with the boost from the solar system makes their electrical usage high. Where do you draw the line on how much everyone should pay for grid access?

If the argument is that the utility is "paying" too much for the excess generation from residential solar systems when truing up on a monthly basis, I disagree. The solar systems are generating electricity at peak hours for the utility - during the day when air conditioners are running, or furnaces are blowing. Having the residential solar systems provide power back to the grid means that electricity is essentially going right next door to the neighbors and Idaho power is getting the retail rate from that neighbor. The solar owner then needs that power back at night and retrieves it from the grid. By going to hourly netting, Idaho Power is always charging the solar owner retail and so is really getting paid twice.

Idaho Power should not be concerned about residential solar cutting into their profits. Solar PV is still very expensive to install and the majority of people will not do it. Since Idaho Power has plans to go to renewables in the long term anyway, why not be the good guys? Why not be the champion of clean energy and out in front on climate change? What a great legacy it would be to look back on as opposed to penny pinching every nickel from the tiny percentage of residents who choose to spend their money on a PV system out of a moral choice for less pollution. They could have bought a gas guzzling SUV with that same money.

Please reconsider.

Thank you.

Amy Taivalkoski

Unique Identifier: 164.165.206.42

Diane Holt

From: shirleenroark@gmail.com
Sent: Tuesday, December 3, 2019 4:52 PM
To: Diane Holt
Subject: Case Comment Form: Wayne Roark

Name: Wayne Roark
Case Number: IPC-e-18-15
Email: shirleenroark@gmail.com
Telephone: 208-789-2069
Address: 2351 N. Tangent ave.
Meridian Idaho, 83646

Name of Utility Company: Idaho Power Co.

Comment: The PUC should uphold the Original program that was agreed upon by Idaho Power and solar customers. Idahoans have invested in local clean energy expecting a fair deal. Idaho families shouldn't have the rules changed on them after they have already made their investment. Allowing existing net metering program and applying the new customers is a commonsense compromise.

Unique Identifier: 164.165.206.42

Diane Holt

From: Kstearns@arcadvisers.net
Sent: Tuesday, December 3, 2019 4:53 PM
To: Diane Holt
Subject: Case Comment Form: Katherine Stearns

Name: Katherine Stearns
Case Number: IPC-E-18-15
Email: Kstearns@arcadvisers.net
Telephone:
Address: 805 East State St.
Boise ID , 83712

Name of Utility Company: Idaho Power

Comment: I would like to voice my opposition to the proposed net metering changes. My understanding is that net metering customers comprise less than 1% of Idaho Power's customers, meaning that this change will not have a significant financial impact on Idaho Power. It will, however, deter residential solar which should be encouraged rather than discouraged. Furthermore, the installation of rooftop solar was a significant financial commitment for us (and others) based on projected long-term recovery of our investment (and environmental benefits). There is no compelling reason to approve the proposed changes.

Thanks for your consideration.

Unique Identifier: 164.165.206.42

Diane Holt

From: craignpenny76@gmail.com
Sent: Tuesday, December 3, 2019 5:09 PM
To: Diane Holt
Subject: Case Comment Form: Craig Morrow

Name: Craig Morrow
Case Number: IPC-E-18-15
Email: craignpenny76@gmail.com
Telephone: 907-602-1399
Address: 110 Voyager St.
Middleton Idaho , 83644

Name of Utility Company: Idaho Power Company

Comment: I find that your act of using my solar energy for your own purposes and taxing me for the use of it is highly unethical. It's much like me helping a friend who got a job but has no transportation. I purchase a car and make the lone payments and tell him he can use the car for transportation. He need not pay the registration fee, maintenance costs, or anything other than the gas. Time goes by and then he comes to me and tells me that he is going to charge me a fee for the use of a car I am letting him use. Now my question, is this ethical? Is this fair? No, it's not. But in reality, that is exactly what you are proposing. You want to basically charge me for the excess energy I am allowing you to use for your own purposes.

Unique Identifier: 164.165.206.42

Diane Holt

From: halliekai1300@gmail.com
Sent: Tuesday, December 3, 2019 5:31 PM
To: Diane Holt
Subject: Case Comment Form: Hallie Hinchman

Name: Hallie Hinchman
Case Number: IPC-E-15-18
Email: halliekai1300@gmail.com
Telephone:
Address:
Boise Idaho, 83702

Name of Utility Company: Idaho Power

Comment: I'm a student in Idaho and have lived here my whole life. I've always noticed how far behind we seem in relation to other states, particularly on the issue of renewable energy. By increasing the payback time on solar panels, they will be less financially advantageous for customers. I understand your want to protect your non-renewable energy business. However, we must be on board, all together, for making the switch. Please make it as feasible as possible for customers to choose the type of energy they really want, and do not increase payback time. Thank you.

Unique Identifier: 164.165.206.42

Diane Holt

From: joshuashill@gmail.com
Sent: Tuesday, December 3, 2019 5:39 PM
To: Diane Holt
Subject: Case Comment Form: Joshua Hill

Name: Joshua Hill
Case Number:
Email: joshuashill@gmail.com
Telephone:
Address:
Boise Idaho, 83705

Name of Utility Company: Idaho Power

Comment: This comment should include attached graphics e-mailed to Curtis Thapen and Stacey Donohue of the Public Utilities Commission.

I, Joshua Seth Hill, do swear that the below testimony is true and accurate to the best of my ability. I am a customer of Idaho Power residing at 1625 S. Latah St, Boise, Idaho 83705.

I testify that the settlement in case IPC-E-18-15 is unfair, unjust and unreasonable. The proposed rates for on-site generation customers are discriminatory and unfair. Before any changes to Schedules 6 and 8 can be made, a full study of the benefits of solar should be completed by multiple parties, including independent third parties.

A full rate change is necessary, and I would suggest a simple time of use rate across all schedules to solve the problem and be updated in future rate cases as needed.

Idaho Public Utilities Commission previous Order regarding Accumulated Net Excess Energy Credit Balances and potentially grandfathering:

In Order No. 32846, the Commission stated, "we find it fair, just, and reasonable for the kWh credit to indefinitely carry forward to offset future bills for so long as the customer remains on the net metering service at the same generation site. Allowing the credits to carry forward indefinitely ensures that customers will be able to use their credits when they need them and thus receive the benefits of their systems."

IPC-E-17-13 - IDP - New schedules for customers with on-site generation

IT IS HEREBY ORDERED that Idaho Power shall close Schedule 84 and create new Schedule 6: Residential Service On-Site Generation and new Schedule 8: Small General Service On-Site Generation.

IT IS FURTHER ORDERED that Idaho Power shall initiate a docket to comprehensively study the costs and benefits of on-site generation on Idaho Power's system, as well as proper rates and rate design, transitional rates, and related issues of compensation for net excess energy provided as a resource to the Company.

IT IS FURTHER ORDERED that Idaho Power shall file a study with the Commission exploring fixed-cost recovery in basic charges and other rate design options prior to its next general rate case.

When Customers go solar, they are paying for the generation, not Idaho Power. Savings and cost-shift from solar when compared to energy efficiency is very similar to the grid. In many ways solar is more beneficial.
From Idaho Power's 2018 Annual report:

"In 2018, 2017, and 2016, Idaho Power expended approximately \$44 million, \$48 million, and \$43 million, respectively, on both energy efficiency and demand response programs."

IDP STAFF: "Demand-Side Management Marketing Expenses versus Total Program Expenses Pages 19-20 of the Demand-Side Management 2018 Annual Report breaks out the marketing expenses of \$1,270,112 from the portfolio total spend of \$44,262,080."

That means the Company spends around 2.87% on marketing to customers encouraging energy efficiency.

"In 2018, Idaho Power's energy efficiency programs reduced energy usage by approximately 173,000 MWh."

173,000 MW or \$14,878,000 (at \$0.086 per kWh, which is less than the actual retail value) of revenue was lost in 2018 due to customers becoming more efficient.

On-site generation customers can function exactly the same as energy efficient customers. Solar is simply one way to be energy efficient AND provide the benefits of distributed energy to the grid.

$\$14,878,000 + \$1,270,112 = \$16,148,112$ in total cost of energy efficiency.

Quote from Idaho Power's 2018 Annual Net metering report:

"There are roughly 650 electrical distribution circuits in the Company's service area.

As of March 31, 2018, there were 2,068 active net metering systems totaling approximately 16 MW on 377 distribution circuits."

16+ MW of generation which costs Idaho Power \$0 to install and maintain. The value of distributed generation is VERY SIGNIFICANT.

"The Company had accumulated approximately 0.5 million, 1.3 million, 2.3 million, and 2.6 million unused excess net energy credits by the end of years 2014, 2015, 2016, and 2017, respectively."

$2,600,000 * \$0.086 = \$223,600.00+$ in FREE ELECTRICITY in 2017.

PUC STAFF: "Distributed energy is every bit as valuable as energy efficiency."

The Energy Information Administration estimates that national electricity transmission and distribution losses average about 6% of the total electricity generated in the United States each year. (40- Independent Statistic & Analysis—U.S. Energy Information Administration. Accessed April 2, 2015: <http://www.eia.gov/tools/faqs/faq.cfm?id=105&t=3>.)

Distributed Generation lowers the transmission cost to the grid.

COMPANY STAFF: "Regarding the 70% fixed cost claim – the Company filed a cost of service study. looking at overall costs. A "class cost of service study" was uploaded as work papers in IPC-E-18-16 docket." (This study looks at Idaho Power's Overall cost of operating).

Provides an overview and explains how came to numbers.

(15:45) open case filed "fixed cost report" - case 18-16

JSH: "When is our peak pricing?"

COMPANY STAFF: "It depends, but power system peaks in late afternoon/evening in summertime."

JSH: "What solar benefits were set aside?"

COMPANY STAFF: "Three components - avoided transmission and distribution capacity, integration costs, environmental benefits."

Idaho Power's Annual Net metering report quotes:

20170428ANNUAL NET METERING REPORT

VII. SYSTEM RELIABILITY CONSIDERATIONS

The circuits that contain the greatest number of net metering systems are largely located in northeast Boise and in the Wood River Valley area, while the circuits that contain the greatest amount of connected net metering capacity tend to be located in mostly agricultural and rural areas. The greatest number of active net metering systems that currently exist on a single distribution circuit is 30 totaling approximately 139 kW. On another distribution circuit, from a capacity perspective, seven generators (all solar) rated at approximately 606 kW are located on that single distribution circuit. That circuit serves mostly rural customers with a calculated summer peak load of approximately 1,900 kW. The net metering penetration on the circuit is approximately 32 percent. The net metered connected kW capacity on the Company's distribution system continues to remain small and the Company has not yet experienced significant operational impacts on these circuits.

...This review may include determining if there is adequate transformation and conductor capacity, as well as a phasing (single- versus three-phase) match. The Company has not denied any net metering applications due to system limitations, but continues to carefully monitor requests for connection to ensure ongoing safe and reliable service is available to both existing and new customers.

...As net metering system penetration increases, the Company will keep the Commission apprised of experienced or anticipated system reliability impacts and will propose mitigation as needed. This may include additional inverter requirements such as smart inverter technology, which can mitigate many high penetration issues.

20180423 ANNUAL NET METERING REPORT

II. SYSTEM RELIABILITY CONSIDERATIONS

The circuits that contain the greatest number of net metering systems continue to be located primarily in northeast and east Boise and in the Wood River Valley. However, greatest net metering connection capacity tends to be on mostly agricultural and rural serving circuits. For example, the largest number of net metering systems connected on a single distribution circuit are 47 which total approximately 244 kilowatts ('kW'). The distribution circuit that leads in connected capacity has only eight solar PV system that are rated at approximately 667 kW. This circuit serves mostly rural customers with a calculated summer peak load of approximately 2,100 kW. During minimum load conditions, the 550 kW of power flows from the circuit into the substation and on to other circuits. Although growing quickly, the net metered connected kW capacity on the Company's distribution system continues to remain small relative to the total load and the Company has been able to manage the minimal operational impacts on these circuits.

...Although some service transformer upgrades have been required, and further study has been necessary, the Company has not denied any net metering applications due to system limitations.

...The use of smart inverter technology, with reactive support capability enabled, may mitigate many high penetration issues and provide additional distributed generation hosting capacity.

Above graphic shows one of many projects where a customer and/or the solar provider fully funded a \$2,000 - \$3,000 transformer upgrade. Upgraded transformers allow the utility company's system to be more efficient as well as recover more revenue due to added capacity on the upgraded circuit (more potential customers).

Below is a check sent to Idaho power to fund a transformer upgrade, this necessary upgrade to the grid was fully funded by the customer. Eventually, if this customer had not gone solar, Idaho Power would have had to fund this upgrade with revenue from every customer.

Idaho power company's comments in support of settlement - pg -7 "The Signing Parties agreed that other costs and benefits (avoided T&D [Transmission & Distribution] capacity, integration costs, and environmental benefits) may be measurable, but agreed not to include those costs or benefits as part of the Settlement Agreement."

COMPANY STAFF: "What are we trying to solve? ...what's the problem? Well the problem is, while the majority of our underlying cost structure is fixed, the way that we collect those costs is through volumetric rates. And when customers reduce their usage for any reason, that creates under-recovery for the utility and what we're left to do is collect that from other customers, and for the residential class that happens through the FCA (Fixed Cost Adjustment). I would tell you that... the company's position is that isn't a solar problem, that's a rate design problem. And we have repeatedly stated that in these cases, and what we've tried to do in the 18-16 report is lay that out, that this needs to be addressed for all of our customers. We are not trying to single out solar."

"When customers reduce their usage for any reason, that creates under-recovery for the utility and what we're left to do is collect that from other customers. The company's position is that isn't a solar problem, that's a rate design problem. And we have repeatedly stated that in these cases."

"and what we've tried to do in the 18-16 report, is lay that out. That this needs to be addressed for ALL of our customers, we're not trying to single out solar."

In Order No. 34046, the Commission closed Schedule 84 to R&SGS customers with on-site generation and created new tariff Schedule 6, Residential Service On-Site Generation, and new tariff Schedule 8, Small General Service On-Site Generation. The Commission also ordered Idaho Power to initiate a docket to comprehensively study the costs and benefits of on-site generation on Idaho Power's system, as well as proper rates and rate design, transitional rates, and related issues of compensation for net excess energy provided as a resource to the Company. Order No. 34046 at 31.

So I ask you, as a solar professional, a local business owner, and a concerned citizen: how can the PUC pass any settlement without inclusion of all the benefits of solar, when they ordered a comprehensive study of costs and benefits of on-site generation customers?

Environmental benefit of land use, grandpa hill used to say, they aren't making any more of it...use our rooftops!

Time of use across all rate schedules is a fair, just and reasonable solution.

Incentivizing West facing solar is a fair, just and reasonable solution.

Incentivizing battery storage with solar, allowing Idaho power access to a percentage of stored kWh's during peak loads is a fair, just and reasonable solution.

I implore the esteemed Idaho Public Utility Commissioners to not pass, in whole or in part, any aspect of case IPC-E-18-15 until all issues mentioned above are rectified.

I would further like to inform the Commission and the public that directly in response to this and other cases filed by Idaho Power, I have spent considerable time and resources to begin a solar advocacy company Awaken Energy LLC - DBA as "Awaken Solar".

I have become distraught at the unfair practices of the utility company, and am dedicating a majority of my time and resources to foster an independent and educational company in the interest of what is fair, just and reasonable to the public regarding their energy rights.

Please find below two programs implemented by Utah and Nevada power companies:

Utah:

Pricing

With Time of Day, your basic service rates still apply. You also pay:

- 1.6334 cents less than your basic service rate (Schedule 1 or Schedule 3) for each kilowatt-hour (kwh) of electricity used during off-peak hours
- 4.3560 cents more than the basic service rate for each kwh of electricity used during on-peak hours

Nevada:

Net Metering

Net metering (NEM) allows you to receive a credit for the energy generated by your renewable energy system, which you can use to offset your monthly energy bill. All customers with renewable energy systems may be eligible for NEM. See below for more information if you are interested in applying for net metering.

Rate Types

Net Metering Rider-405 (NMR-405)

Customers who installed or had an active application for a rooftop solar system of 25 KW or less on or after June 15, 2017 are automatically placed on this rate and in the applicable tier.

[LEARN MORE](#)

Net Metering Rider-G (NMR-G)

Customers who installed or had an active application for a rooftop solar system of 1,000 KW or less as of December 31, 2015 are grandfathered into original NEM rules and rates.

[LEARN MORE](#)

Net Metering Rider-A (NMR-A)

Southern Nevada customers who installed or had an active application for a rooftop solar system of 1,000 KW or less between January 1, 2016 and June 14, 2017. This rate is not available in northern Nevada.

Unique Identifier: 164.165.206.42

Diane Holt

From: spencer.morley70@gmail.com
Sent: Tuesday, December 3, 2019 5:42 PM
To: Diane Holt
Subject: Case Comment Form: Spencer Morley

Name: Spencer Morley
Case Number: IPC-E-18-15
Email: spencer.morley70@gmail.com
Telephone:
Address:
Meridian Idaho, 83642

Name of Utility Company: Idaho Power

Comment: I have worked in the solar industry in Idaho for 3 years now. I am an apprentice electrician and the experience I have gained installing solar has been invaluable to my career and life goals. With this job I have seen much of the State and met many good Idahoans along the way. When I heard about the rate change for solar customers here in Idaho I was very concerned. If it were to be so drastically adjusted as it is currently proposed to be, the people that my company (Auric Energy) currently employs would be directly affected in a very negative way. Not to mention the countless good people in this state that I have installed solar for who would lose thousands on their investment in clean energy. The benefits for Idaho solar owners have not been weighed in this decision. What I see is that the cons have been considered only, and if Idaho Power and the PUC were to investigate the good that solar energy brings they would draw a different conclusion.

The proposal as it currently stands is direct discrimination against solar power, homeowners, and the solar industry. If this change were brought about it would not remediate the issues Idaho Power claims that it will. Alterations of power rates instead on a statewide scale including peak demand, time of use, etc, would largely resolve the matter at hand. By targeting solar owners Idaho Power is simply injuring a small number of their customers, and missing the bigger picture. I propose that the PUC and Idaho Power put the effort into real research on solar benefits here in Idaho, and make changes to help their customers as well as our environment.

Sincerely,

Spencer Morley

Unique Identifier: 164.165.206.42

Diane Holt

From: Ben@campurllc.com
Sent: Tuesday, December 3, 2019 5:43 PM
To: Diane Holt
Subject: Case Comment Form: Ben Pursley

Name: Ben Pursley
Case Number: IPC-E-18-15
Email: Ben@campurllc.com
Telephone: 2084722831
Address: 4015 N Whitehead St
Boise Idaho, 83703

Name of Utility Company: Idaho Power

Comment: Allowing Idaho Power to reduce net metering credit to producers of green energy , through their proposed transition from retail rate monthly net metering to net hourly billing at an Export Credit Rate is unconscionable, it is wrong, and this case should be thrown out. Consumers and local sustainable energy producers should be valued higher than public utility companies. Idaho Power should embrace green energy, and look for opportunities and programs that encourage further and future development and implementation of sustainable energy production.

Unique Identifier: 164.165.206.42

Diane Holt

From: cat@gietzensolar.com
Sent: Tuesday, December 3, 2019 5:47 PM
To: Diane Holt
Subject: Case Comment Form: Cat Gietzen

Name: Cat Gietzen
Case Number: IPC-E-18-15
Email: cat@gietzensolar.com
Telephone: 2087358990
Address: 120 9th Ave South
Buhl Idaho, 83316

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

First and foremost, thank you for being the voice of the public and allowing comment as you navigate the cases before you.

As a solar installer and Idaho Power consumer, we have always understood that rates change with utilities. At the same time, this is not a simple rate change. We see this as a complete restructuring of an entire program. We have sold and installed many systems under this net metering agreement and never promised rates would be the same, but this new program will drastically affect the payoff and their investment. Please at the very minimum, grandfather the current on site generation customers with the current program so they can continue on with their investment as they intended and continue to be satisfied solar and Idaho Power Customers. If this new program is what we move forward with, that's fine as we still see it as a valuable investment for those who want to be energy independent. We have worked very hard at keeping the integrity of selling solar very high and in accordance with the Consumer Protection Act and will continue to do so as we now have a tangible set of parameters for the new program. Please at the minimum, protect the small businesses and families of Idaho who have made a decision to invest in renewable energy under the current program.

Sincerely,
Cat Gietzen

Unique Identifier: 164.165.206.42

Diane Holt

From: info@alternatepowerdesigns.com
Sent: Tuesday, December 3, 2019 5:58 PM
To: Diane Holt
Subject: Case Comment Form: Scott Moore

Name: Scott Moore
Case Number: IPC-E18-15
Email: info@alternatepowerdesigns.com
Telephone: 2082759655
Address: 1840 E. Mary Lane
Meridian ID, 83642

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

In response the IPC proposed Net Metering (NM) changes and the Intervening parties agreed settlement. I would like to you to consider denying the requested changes based on my following observations.

1. IPC claims that these changes are needed to cover the actual cost of maintaining a NM customer that offsets a portion or all of their monthly power usage, otherwise non-net metering customers have that cost unfairly shifted to them.
2. If that cost can be measured or calculated accurately for delivering power during times when the on-site generation is below consumed power usage, it would likely be a very small or insignificant cost compared to all of the other cost shifted amounts that non-NM customers already pay. These cost would include customer that cost much more provide power to such as summer cabin in Lowman, ID compared to a Boise area. Yet they both pay the same base service charge and while the cabin may use less power and send much less annually with IPC.
4. There is also unfairness or cost shifted to customers under the IPC's Energy Efficiency Services Program with adds a monthly fee of ~4% to all customers bill to pay for IPC's business customer to install higher efficiency devices to reduce power consumption. This program had been justified by IPC before the PUC as \$1 spent on power reduction can save \$3 in new power and distribution. Yet went a NM customer not only reduces their daytime load and possibly their neighbor's load, It appears to have no value.
- 5, IPC also has a time of day billing rate that allows customer to get a lower rate at night to encourage shed daytime load. This again is what solar NM customer accomplish.
6. Many things in life and business are unfair in some way or another if examined close enough and that why the significance of the situation matters. IPC has about 5000 NM customer out of 570,000 total customers which is less than 0.1% and if 1/2 of those NM customers where at net-zero annually, that would be 0.05%. I doubt that this is in the top 10 thing of cost unfairness or cost shifted to IPC's non-NM customers!
7. I believe that Net Metering in Idaho will continue the be a problematic issue before the PUC until Idaho passes laws pertaining to Net Metering like so many other states have. For example Oregon statue give NM customers a 1:1 power credit and annual expiration in March that credits the customer at avoided cost back to the customer.

8. IPC also justifies this current action as needed to avoid problem from a rapid increase in NM customers. This condition is likely caused by the 30% Federal tax credit expiring starting next year. For a customer considering NM based on financial return on investment, this change makes not feasibly any longer. This would be a good reason to deny the settlement to determine if NM applications diminish and if the State can address this in new laws.

Unique Identifier: 164.165.206.42

Diane Holt

From: mikekochert46@gmail.com
Sent: Tuesday, December 3, 2019 6:13 PM
To: Diane Holt
Subject: Case Comment Form: Michael Kochert

Name: Michael Kochert
Case Number: IPC-E-18-15
Email: mikekochert46@gmail.com
Telephone: 2083088046
Address: 1622 S 1625 E
Gooding Idaho, 83330

Name of Utility Company: Idaho Power Co
Comment: Thank you for the opportunity to comment on the proposed action.

As a resident of Idaho who installed residential solar panels in 2015, I am extremely concerned about the proposed settlement that would decrease the value of the credits that we receive from Idaho Power for electricity that we generate under their net program. My wife and I have a 6 kW system consisting of 24 ground mounted panels in our barnyard north of Gooding Idaho. After having solar for only 4 years, we have not yet reached our return metering on Investment. It is extremely unfair for Idaho Power to renege on their promised agreement, which was the basis for our decision to Invest In solar panels. We had considered adding more solar generation to the farm, but if these new rules are in place, any project would be cost-prohibitive. This proposal could cost us and the more than 4,000 other Idaho families that have Invested in solar generation literally thousands of extra dollars on our electricity bills. Those of us who invested early in local, clean energy should not be penalized for doing the right thing at the right time. We acted in good faith, and Idaho Power should keep up their end of the bargain. The rules shouldn't change after families and Individuals have already made their large Investments. Idaho Power should keep up its end of the bargain. Idahoans have invested in local clean energy expecting a fair deal

Climate change is already threatening our infrastructure and our environment in many ways. Allowing existing solar customers to stay on the existing net metering program and applying the new program to new customers is a common sense compromise that allows all parties to keep agreements made in good faith. Now is not the time to discourage Innovative clean energy solutions. Residential solar energy will be a critical part of a more reliable, sustainable energy future for Idaho.

I urge you to allow existing customers to stay on the existing net metering program.

Unique Identifier: 164.165.206.42

Diane Holt

From: ron-hill@q.com
Sent: Tuesday, December 3, 2019 6:27 PM
To: Diane Holt
Subject: Case Comment Form: Ron Hill

Name: Ron Hill
Case Number: IPC-E-18-15
Email: ron-hill@q.com
Telephone: 2085145739
Address: 10459 W Shadow Rock St
Boise ID, 83714

Name of Utility Company: Idaho Power

Comment: I have two major concerns. Existing on-site generators should be grandfathered, and the eventual export credit rate of 4.4 cents per kW-hr is too low for Schedule 6 customers when combined with net hourly billing.

Existing on-site generators conducted economic feasibility calculations based on Idaho Power's current net metering rate structure. It is not fair for Idaho Power to pull the rug out from under these customers because these proposed changes will drastically change the payout times for existing systems. For example, in my case the payout time for my solar panel system is 22 years under the current net metering rules, but it becomes 38 years under the proposed new rules. Not fair!

Existing on-site generators should be grandfathered-in at the current net metering rate structure. More specifically, any customer with an approved Schedule 6 or Schedule 8 application, dated on or before the final promulgation date of the proposed new net metering rules, should be grandfathered-in.

I fully agree that new on-site generators should pay their fair share to financially support the grid infrastructure. However, the proposed eventual export credit rate of 4.4 cents per kW-hr is too low for Schedule 6 customers when combined with net hourly billing. On the one hand, Idaho Power promotes conservation by, for example, sending out LED light bulbs to customers free of charge. But yet, at the same time, they want to financially penalize on-site generators who are also conserving electricity.

Pragmatically, the excess electricity generated in my solar panels is used by my next door neighbors. The only portion of the grid that I am using is the electric line between my house and theirs. Idaho power wants to buy my excess power at 4.4 cents per kW-hr and sell it to my neighbors 80 feet away at double the price. The fact of the matter is that I am saving Idaho Power transmission costs because of the short distance between my house and my neighbor's houses.

At our house we typically use electricity first thing in the morning and then again in the evening. But, during the day when our solar panels are producing power, the only thing running in our house is the refrigerator. So, under the proposed hourly net metering rules, I would be selling almost all of my generated electricity to Idaho Power on-the-cheap, and purchasing almost all of the electricity used in our house at retail. My point is the proposed eventual export credit rate of 4.4 cents per kW-hr is too low for Schedule 6 customers when combined with net hourly billing.

In conclusion, I encourage Idaho Power to strive hard to make rooftop solar and other forms of on-site generation a high priority in reaching toward the goal of 100% renewable by 2045. Unfortunately, the proposed changes to net metering will make rooftop solar economically unviable.

Diane Holt

From: suer811@gmail.com
Sent: Tuesday, December 3, 2019 6:30 PM
To: Diane Holt
Subject: Case Comment Form: Susan Ripley

Name: Susan Ripley
Case Number: IPC-E-18-15
Email: suer811@gmail.com
Telephone: 2088822914
Address:
Moscow Idaho, 83843

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

The League of Women Voters of Idaho (LWVID) strongly urges you to reject the settlement agreement presented in IPC-E-18-15 for the following reasons.

- In case IPC-E-17-13, we, and many others, asked for Idaho Power Co. (IPC) to complete studies that investigate the benefits and costs of roof top solar to the company before creating a new customer class. None of those studies has been completed. The settlement is based on assumptions and conjectures put forth by IPC. We believe the studies must be done before any valid settlement agreement is reached.
- None of the affected parties appear to have been included in the settlement agreement discussions. None of the roof top solar investors are signatories to the agreement and they will be most affected by the regressive rate structure proposed by the company. In addition, the new rate class effectively will kill the incentive for future roof top solar investment by individuals.
- There is an energy policy vacuum in Idaho. Since the legislature will not tackle these tough issues, we urge the Public Utilities Commission to be bold in advancing progressive policies that give the ability of individuals and small businesses the choice to be part of the solution to energy and climate problems. The future is going to be different from the past. The cost of a kWh is no longer the only factor to consider in rate cases and settlement agreements. The public interest must play a large role.

The LWVID is a statewide, nonpartisan organization that studies an issue and comes to consensus before adopting a position. The League has adopted positions that support policy, legislation, regulation and funding to attain clean air standards, to reduce greenhouse gas emissions and to increase energy efficiency and reliance on renewable energy resources.

Regards,
Susan Ripley
President, League of Women Voters of Idaho

Unique Identifier: 164.165.206.42

Diane Holt

From: jcinsara@hotmail.com
Sent: Tuesday, December 3, 2019 6:44 PM
To: Diane Holt
Subject: Case Comment Form: Justin Crevier

Name: Justin Crevier
Case Number: IPC-E-18-15
Email: jcinsara@hotmail.com
Telephone:
Address:
Eagle ID, 83616

Name of Utility Company: Idaho Power

Comment: Before they try to buy the power we generate at a low price and resell it to consumers at higher price, Idaho Power needs to consider the long term. (1) Solar batteries are becoming cheaper. If running solar imposes an unfair cost on us, we will eventually just buy a battery and effectively leave the grid. (2) Their customer base will continue to expand--they can feed this with either locally-purchased power (from us, at a fair market rate) or buy surplus need from generators in California and elsewhere. Short term minor profits or long term stable income flow? Their choice.

Unique Identifier: 164.165.206.42

Diane Holt

From: jmrohling@gmail.com
Sent: Tuesday, December 3, 2019 6:48 PM
To: Diane Holt
Subject: Case Comment Form: Jane Rohling

Name: Jane Rohling
Case Number: IPC-E-18-15
Email: jmrohling@gmail.com
Telephone: 2089383529
Address: 582 Palmetto Drive
Eagle ID, 83616

Name of Utility Company: Idaho Power Company

Comment: Idaho Power Company's (IPC) own website states:

"We are alternative energy leaders – as investors, developers, operators, and strategists." If that's the case, then the company's settlement (Order No. 34046 and Case No. IPC-E17-13) regarding net metering, which will directly and negatively impact constituents who have actually invested in on-site solar power systems, should not have been approved without input from the current net-metering customers. 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.

IPC acknowledges this decision will have impact the return on investment that customers will realize from their investment in solar systems on IPC's own website: "please be sure to educate yourself about the current cases before the Idaho Public Utilities Commission that could change your expected payback date when making a solar investment." (<https://www.idahopower.com/energy-environment/green-choices/solar-power-options-customer-generation/>)

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.

Unique Identifier: 164.165.206.42

Diane Holt

From: ryan.bushland@gmail.com
Sent: Tuesday, December 3, 2019 7:13 PM
To: Diane Holt
Subject: Case Comment Form: Ryan Bushland

Name: Ryan Bushland
Case Number: IPC-E-18-15
Email: ryan.bushland@gmail.com
Telephone:
Address:
Meridian ID, 83646

Name of Utility Company: Idaho Power

Comment: I have been selling solar in Idaho for 4 years. I believe that the proposed settlement will have a devastating impact on future residential and commercial solar projects funded by private parties. Compensating small scale overproduction at wholesale rates will be a deterrent for many interested parties, especially for small scale solar. If these changes are passed then many solar professionals will be forced to leave the state to support their families.

I feel more important is the issue of grandfathering current customers under the current agreement. It is seems like changing a system after private individuals invested their hard earned money is wrong. If a change is made then it is fair for future customers make their decision off what changes get made. It is not reasonable to make a change if a customer bought solar with the current net metering agreement.

Unique Identifier: 164.165.206.42

Diane Holt

From: leigh4d1@gmail.com
Sent: Tuesday, December 3, 2019 7:19 PM
To: Diane Holt
Subject: Case Comment Form: Victoria Ford

Name: Victoria Ford
Case Number: IPC-E-18-15
Email: leigh4d1@gmail.com
Telephone: 208-297-3614
Address: 927 N Bell Ln
Boise ID, 83703

Name of Utility Company: Idaho Power

Comment: Thank you for the opportunity to comment on Idaho Power's proposed rate changes.

I would like to do the right thing for my children's (and all children's) future and get solar. I am not rich and am aware that solar is expensive, but thought if I saved it would pay itself off in the long run. The plan Idaho Power would like adopted makes residential solar as financially unfeasible. Currently only about 5000 people have residential solar this cannot be about recovering costs. It seems they only want to stop us from getting solar.

For those that already have solar, the proposed changes would also be unfair. These Idahoans have invested in local clean energy expecting a fair deal. Idaho Power should keep up their end of the bargain. Idaho families and small businesses shouldn't have the rules changed on them after they have already made their investment. The new proposal could cost existing solar customers thousands of dollars on their electricity bills.

Idaho Power has an interest (and probably requirement) to increase the profit of their shareholders but can they do that at all of our expense? We share the same air and water and it's our children that will have to live with the consequences of our mistakes.

Thanks again for the chance to comment.

Unique Identifier: 164.165.206.42

Diane Holt

From: pei-linyu@boisestate.edu
Sent: Tuesday, December 3, 2019 7:33 PM
To: Diane Holt
Subject: Case Comment Form: PEI-LIN YU

Name: PEI-LIN YU
Case Number: IPC-E-18-15
Email: pei-linyu@boisestate.edu
Telephone: 2088635681
Address: 250 williams st
boise id, 83706

Name of Utility Company: LAH Idaho PUC

Comment: I urge you in the strongest terms to grandfather existing net-metering customers under the program which drove the designs and installations of their systems. Around the U.S., in other states, 20 years from installation has been a typical grandfathering period, which coincides with the expected lifetime of solar PV panel generation. That grandfathering should follow our accounts, if not our addresses. Existing customers MUST be grandfathered, which is fair and economically just to the citizens of Idaho. Thank you for the opportunity to comment.

Unique Identifier: 164.165.206.42

Diane Holt

From: gemmautting1@gmail.com
Sent: Tuesday, December 3, 2019 7:36 PM
To: Diane Holt
Subject: Case Comment Form: Gemma Utting

Name: Gemma Utting
Case Number: IPC-E-18-15
Email: gemmautting1@gmail.com
Telephone: 208-340-8989
Address: 424 N. Mobley Drive
Boise IDAHO, 83712

Name of Utility Company: Idaho Power

Comment: My husband and I invested most of our saving this past summer into installing both a new roof and 15 beautiful solar panels on the new roof, through Auric.

We did so for three reasons:

1. Doing something to lighten our carbon footprint feels vital as we think about the world our children will be inheriting. Even though we have geothermal heat, no clothes dryer, and our old electric bills were around \$50 a month - this was something we could do to make a difference.
2. This being said, we made the decision based on a sound financial reckoning - a 1:1 ratio on the net metering as stated in all the literature we read and signed during this process.
3. Any additional savings we may make to allow our 15 panels to "go farther" would allow us to plug in an electric car sooner than later -- also a goal.

My request of you Public Utility Commissioners is this:

Insist Idaho Power maintain a 1:1 ratio not only for those of us who have already signed up, but going forward. The goal here out to be focused on long term global benefit, not company profits.

Also, they need to maintain the 24 hour day unit of measure - not the 1 hour.

Thank you.

Unique Identifier: 164.165.206.42

Diane Holt

From: ml.stuart+puc@gmail.com
Sent: Tuesday, December 3, 2019 8:00 PM
To: Diane Holt
Subject: Case Comment Form: Michael Stuart

Name: Michael Stuart
Case Number: IPC-E-18-15
Email: ml.stuart+puc@gmail.com
Telephone:
Address:
Boise ID, 83713

Name of Utility Company: Idaho Power

Comment: I am a private homeowner in the Treasure Value that installed a solar panel array this year. I have four comments regarding Idaho Power's proposal to alter its rate structure for customers such as myself.

1) At a minimum, it is most fair for solar installations built under previous programs to continue to be billed at the terms in effect at the time of installation. "Grandfathering" current Net Metering customers acknowledges the risk and initiative taken by these customers to invest significantly in a capital asset (the solar system) that benefits the community and the environment. Studies have shown that the fraction of total customers these early adopters represent to Idaho Power is not significant enough to materially shift utility costs to traditional customers.

(See "The Value of Rooftop Solar Power for Consumers and Society" by Environment America Research & Policy Center at <https://environmentamerica.org/sites/environment/files/reports/AME%20ShiningRewards%20Rpt%20Oct16%201.1.pdf> and "Putting the Potential Rate Impacts of Distributed Solar into Context" by Lawrence Berkeley National Laboratory at <https://emp.lbl.gov/publications/putting-potential-rate-impacts>)

The Settlement Agreement's shift to "Net Hourly Billing" encourages the pairing of generation and consumption of electricity within the same hour as "exports" to the grid are valued substantially less than "imports." Existing installation owners designed systems for a reconciliation of imports and exports at a much larger time interval: monthly or annually. The design of a system under one program would obviously be substantially different than under the other. Furthermore, customers with existing installations have virtually no economically viable options to adjust their systems to match the change. Instead, they must absorb the cost.

Insignificant cost to the community of electricity consumers versus distinct and measurable cost to existing installation owners. The prior is far fairer than the latter. Please, at a minimum, grandfather existing installations to the current Net Metering plan.

2) The grandfathering dates proposed by Idaho Power are unreasonable. A "legacy customer" should be any customer with an active installation when the new policy is approved by the commission (is real) not when changes to that policy is proposed (is not real). Additionally, a 10-year end date is not necessarily enough to cover the payback horizon on a newly installed installation at the beginning of this window. (My system, for example, has a payback horizon of 14 years.)

3) Idaho Power describes their legal language around the risk of rate structure changes in the application for on-site generation. Legally, the language is correct. I ask the commission to consider the impact of policy beyond mere legalities. What is fair? What is best for the community? What is best for Idaho? Legal is not synonymous with "best."

4) Finally, most of the 50 states in the Union have funded studies into the value of solar. The variability in the results of these studies makes it clear that determining the value of solar and assessing the impact of distributed generation of electricity is a complex issue. Yet Idaho Power's argument that on-site generation customers are shifting costs to traditional customers is lacking in detail. I strongly encourage the commission to expect more from Idaho Power. Put the state of Idaho on the list of states/commissions that have further studied this complex issue in a scientifically disciplined way. Ideally Idaho can contribute to the body of knowledge leading to a fair, rational and scientifically defensible policy by publishing the results.

Direct Idaho Power to explain the math behind their position. This issue has been under discussion for over a year. Where on Idaho Power's website is the Value of Solar described for their service area? I couldn't find anywhere. Where do they describe the components of the costs? Again, only simplistic statements without backing. How are distributed solar areas funded by customers worse for the utility than centralized arrays build by Idaho Power? Nothing is described.

Utilities are regulated for a reason. To protect the public good and ensure that the utility acts in the best, ongoing interest of the people in their service areas. The public good is measured by a yardstick far more particular than "legal." Legality is the minimum expectation. "For the good of the people" is the real expectation (while remaining legal, obviously).

Unique Identifier: 164.165.206.42

Diane Holt

From: jekel_7@msn.com
Sent: Tuesday, December 3, 2019 8:10 PM
To: Diane Holt
Subject: Case Comment Form: barb jekel

Name: barb jekel
Case Number: IPC-E-18-15.
Email: jekel_7@msn.com
Telephone:
Address: 2862 N Haven Dr
eagle id, 83616

Name of Utility Company: Idaho Power

Comment: I have read over the issues in play due to this change over in metering measurement methods and affects to those already on the "off" line. Idaho power should be so proud of these individuals, and supportive of their work and dedication in being the forerunners and enthusiasts in shaping solar energy growth in Idaho. They were originators, they did the work, the research, and made it a viable entity here in Idaho as first and sole users. They should be in the fairest rate charge service grouping above all broach. In the big picture of Idaho Power service, these dedicatees would be but a minute increment and the most deserving. In Idaho's reach to 100%, will it be achieved with the character and good business practice those seeking natural remedies for our power needs just automatically brings to the table?

Unique Identifier: 164.165.206.42

Diane Holt

From: Richardschupack@cox.net
Sent: Tuesday, December 3, 2019 8:20 PM
To: Diane Holt
Subject: Case Comment Form: Richard Schupack

Name: Richard Schupack
Case Number: IOC-eE-18-15
Email: Richardschupack@cox.net
Telephone: 2087201446
Address: 417 N 5th st
Bellevue Idaho, 83313

Name of Utility Company: Idaho power

Comment: We should not let Idaho power decrease the rate that we have had over the years. We spent a lot of money putting those solar panels in \$15,000. And for them now to come from behind and say they want to give us a lower rate is ridiculous. Let's support solar powered please. Do you not believe in global warming please vote no thank you

Unique Identifier: 164.165.206.42

Diane Holt

From: meadargj@gmail.com
Sent: Tuesday, December 3, 2019 8:25 PM
To: Diane Holt
Subject: Case Comment Form: Russell Johnson

Name: Russell Johnson
Case Number: IPC-E-18-15
Email: meadargj@gmail.com
Telephone:
Address:
Boise ID, 83709-1242

Name of Utility Company: Idaho Power

Comment: Idaho Power has served us well for many decades, but this change of policy should die here!

In good faith, we set up solar power at great expense for our home and our business to be good citizens. We also have enjoyed the many benefits from our solar arrays.

We also believe that fewer citizens will consider solar as a good future investment, if this change is allowed to move forward.

We predict that more of our neighbors will turn to wood stoves that pollute our beautiful valley, because investing in solar will have become unreliable. We also believe that many solar companies will find homes in more welcoming states.

We strongly object to this change of policy!!

Retroactive changes should be bad policy for this and any future decisions, but also consider the message that this sends to others who want to improve their world.

Unique Identifier: 164.165.206.42

Diane Holt

From: michael schn75@gmail.com
Sent: Tuesday, December 3, 2019 8:34 PM
To: Diane Holt
Subject: Case Comment Form: Michael Schneider

Name: Michael Schneider
Case Number: IPC-E-18-15
Email: michael schn75@gmail.com
Telephone: 2087240313
Address: 1715 South Oakley Avenue
Nampa ID, 83686

Name of Utility Company: Idaho Power

Comment: I would like to add comments to the current case of Idaho Power changing the net-metering agreement. I am opposed to the change. Idaho Power should honor the agreement with current solar customers. Idaho Power should also continue to encourage clean energy use. I do understand that Idaho Power has to continue to operate a public utilities business model and they made the existing net-metering in that model.

I am a home solar owner. It is going to take about 18 years for the system to pay for itself. And my monthly payments are slightly more than the regular electric bill. Getting solar is not about my profit but an equitable way for me to invest in clean energy.

The IUC should continue to support clean energy options for consumers.

Unique Identifier: 164.165.206.42

Diane Holt

From: chadmw3@gmail.com
Sent: Tuesday, December 3, 2019 8:46 PM
To: Diane Holt
Subject: Case Comment Form: Chad Wahlquist

Name: Chad Wahlquist
Case Number: IPC-E-18-15
Email: chadmw3@gmail.com
Telephone:
Address: 3122 Central Park Ct
Caldwell ID, 83605

Name of Utility Company: Idaho Power

Comment: I am opposed to altering the net metering rules as they currently stand. Customers generate power for the utility company, which the utility company then gets to sell to other, non-solar customers. That means they get to sell electricity that they don't produce, which means they get a 100% profit margin on that electricity. This smacks of greed to me; they want to lower the fair, one-to-one net metering credit in favor of (basically) a 0.4-to-1 net metering. This will hurt our Idaho economy. Solar providers will leave the state, resulting in less jobs and less tax revenue for the state. The solar industry, according to a recent article I read, is the fastest growing industry in America right now. The article said that if every job in the coal industry was lost tomorrow, the solar industry (at its current rate of growth) would absorb all of those jobs within less than one year. Solar is the future and our state should be doing everything we can to foster this industry and incentivize it. The fact that Idaho Power gets to sell the customer-generated solar electricity during the daytime with a 100% profit margin makes the 1-to-1 credit more than fair. I believe it behooves the future of our state for the PUC to do everything in its power to preserve the net metering program as a fair, 1-to-1 program to keep solar as a booming industry here in Idaho. This translates to jobs, tax revenue, and energy efficiency in the State of Idaho. This seems like a no-brainer to me. A vote to keep the 1-to-1 credit in Idaho is a vote to secure the future of Idaho as well as a vote to curb the monopoly that Idaho Power has on energy in the state. As Americans, we want the right to determine where our power comes from. If the net metering is changed as Idaho Power has proposed in their docket, solar will no longer be a viable industry in the state. Solar companies will move out of the state, taking jobs and money with them, and the people of Idaho will be stuck with no options other than Idaho Power. That's just unAmerican. We want the ability to choose for ourselves. Thank you for taking the time to read my comment. I hope that you will vote in favor of our great state and our future by preserving solar.

Unique Identifier: 164.165.206.42

Diane Holt

From: P-Neill@outlook.com
Sent: Tuesday, December 3, 2019 8:46 PM
To: Diane Holt
Subject: Case Comment Form: Paul Neill

Name: Paul Neill
Case Number: Docket IPC-E-18-15
Email: P-Neill@outlook.com
Telephone: 2085149491
Address: 11763 Good Day Road
Melba ID, 83641

Name of Utility Company: Idaho Power

Comment: I would like to encourage the IPUC to allow the grandfather provision for solar installations and other home generation systems. As a homeowner, we've invested a tremendous amount of money to do what's right for the environment, the State of Idaho and it's residents. The only way we can recoup our initial investment to offset our electric utility bill. I feel it's simply not fair to change the terms that homeowner's used to calculate their investment payback. I ask you to please grandfather all projects currently installed and all projects which have submitted applications. Thank You!

Unique Identifier: 164.165.206.42

Diane Holt

From: GARNERSINMH@HOTMAIL.COM
Sent: Tuesday, December 3, 2019 8:59 PM
To: Diane Holt
Subject: Case Comment Form: SCOTT GARNER

Name: SCOTT GARNER
Case Number: IPC-E-18-15
Email: GARNERSINMH@HOTMAIL.COM
Telephone: 2085900591
Address: 1885 NORTH 5TH EAST
MOUNTAIN HOME ID, 83647

Name of Utility Company: Idaho Power

Comment: Recently I received a letter from Idaho Power stating intentions of going back on their agreement to give a fair rate of credits on my solar system. This after they claim to be green by 2045. They will need solar to achieve this goal yet they want solar systems to give them our power at ridiculously lower and lower rates while they sell that power at much higher rates. They are already get a great deal on the power I create. Please have them Grandfather us in or keep the agreement they made originally made.

Thank You Scott Garner

Unique Identifier: 164.165.206.42

Diane Holt

From: todynewb@gmail.com
Sent: Tuesday, December 3, 2019 9:01 PM
To: Diane Holt
Subject: Case Comment Form: Cody Newbill

Name: Cody Newbill
Case Number: IPC-E-18-15
Email: todynewb@gmail.com
Telephone:
Address:
Meridian Idaho, 83642

Name of Utility Company: Idaho Power

Comment: This last summer I had solar panels installed on my home. Part of making this significant investment was the current net metering policy and is what I agreed to when I decided to have them installed. Changing these terms for existing customers is a breach in that agreement. Please do not punish people for making a decision that made sense at the time and changing the rules so that their decision, through no fault of their own, may no longer make financial sense now.

Unique Identifier: 164.165.206.42

Diane Holt

From: info@alternatepowerdesigns.com
Sent: Tuesday, December 3, 2019 9:06 PM
To: Diane Holt
Subject: Case Comment Form: Scott Moore

Name: Scott Moore
Case Number: PUC-E-18-15
Email: info@alternatepowerdesigns.com
Telephone: 2082759655
Address: 1840 E. Mary Lane
Meridian ID, 83642

Name of Utility Company: Alternate Power Designs, LLC

Comment: Please add or replace this corrected comment with my earlier submitted comment today.

Dear, Idaho Public Utilities Commission

In response the IPC proposed Net Metering (NM) changes and the Intervening parties agreed settlement. I would like to you to consider denying the requested changes based on my following observations.

1. IPC claims that these changes are needed to cover the actual cost of maintaining a NM customer that offsets a portion or all of their monthly power usage, otherwise non-net metering customers have that cost unfairly shifted to them.
2. If that cost can be measured or calculated accurately for delivering power during times when the on-site generation is below consumed power usage, it would likely be a very small or insignificant cost compared to all of the other cost Currently being shifted to non-NM customers. These shared or shifted cost would include customer that cost much more provide power to such as summer cabin in Lowman, ID compared to a home the Boise area. Yet they both pay the same base service charge and while the cabin customer may use less power and spend much less annually with IPC.
4. There is also unfairness in cost shifted to customers under the IPC's Energy Efficiency Services Program with charges a fee of ~4% to all customers monthly bill to pay for IPC's business customer to install higher efficiency devices to reduce power consumption. This program had been justified by IPC before the PUC as \$1 spent on power reduction can save \$3 in new power and distribution cost. Yet when a NM customer reduces their daytime load and possibly their neighbor's load, it appears to have no extra value.
- 5, IPC also has a time of day billing rate that allows customer to get a lower rate at night to encourage shedding of daytime load. This again is what solar NM customer accomplish.
6. Many things in life and business are unfair in some way or another if examined close enough and that is why the significance of the situation matters. IPC has about 5000 NM customer out of 570,000 total customers which is less than 0.1% and if 1/2 of those NM customers where at net-zero annually, that would be 0.05%. I doubt that this is in the top 10 thing of unfairness or cost shifted to IPC's non-NM customers!

7. I believe that Net Metering in Idaho will continue to be a problematic issue before the PUC, until Idaho passes laws pertaining to Net Metering like so many other states have. For example Oregon statute gives NM customers a 1:1 power credit with annual expiration in March that credits excess power back to the customer at avoided cost rate.

8. IPC also justifies this current action as needed to avoid future problems from the rapid increase in NM customers. This condition is likely caused by the 30% Federal tax credit expiring starting next year. For a customer considering NM based on financial return on investment, this change alone will make investment in solar much less practical. This alone would be a good reason to deny the IPC case at this time to determine if NM applications diminish and if the State can address this in new laws.

Sincerely,
Scott Moore

Unique Identifier: 164.165.206.42

Diane Holt

From: jillianemmahanson@gmail.com
Sent: Tuesday, December 3, 2019 9:08 PM
To: Diane Holt
Subject: Case Comment Form: Jillian Hanson

Name: Jillian Hanson
Case Number: IPC-E-18-15
Email: jillianemmahanson@gmail.com
Telephone: 2088412225
Address: 2303 N 22nd St
Boise ID, 83702

Name of Utility Company: Idaho Power

Comment: The Commission should uphold the original program that was agreed upon by Idaho Power and solar customers. We expect the utilities commission to stand up for what is best for the people of Idaho. This would be a step backwards; we need to move towards 100% renewable energy as fast as possible. This is unfair and not in the interest of Idahoans. It is in the interest of a large utility (IdahoPower).

Unique Identifier: 164.165.206.42

Diane Holt

From: dunksond@juno.com
Sent: Tuesday, December 3, 2019 9:10 PM
To: Diane Holt
Subject: Case Comment Form: Sondra Dunkle

Name: Sondra Dunkle
Case Number: IPC-E-18-15
Email: dunksond@juno.com
Telephone:
Address: 965 Sagewood Pl
Pocatello ID, 83201

Name of Utility Company: Idaho Power

Comment: I'm commenting on the proposal by Idaho Power Company to change their net metering program, to lower the amount of credit a customer receives for generation of solar power into the IPC grid. I am STRONGLY opposed to the requested changes, and urge the IPUC to vote NO.

We paid (borrowed) over \$25,000 of our own money to purchase solar panels for our roof, get them installed, all the wiring completed, the shut-off switch installed, a net meter installed, get all inspections passed, and our solar system connected to the meter and IPC grid. We did that, in part, because last year the IPUC did not allow IPC to change or remove their net metering system for solar generating customers. (THANK YOU!) Thus we knew that we would receive equal compensation in credits for the excess solar power that we generated that went back into IPC grid. (Power the IPC could then sell to other customers).

In Pocatello this year (2019), roughly 90 households had solar installed through the Solarize Pocatello campaign (organized & run by volunteers). Boise ran the same campaign. Moscow did so a few years ago. A conservative estimate of the average cost per household for Pocatello residents to go solar was \$24,000. That amounts to ~\$2.61M that IPC did not have to spend on infrastructure in order to receive our excess energy free! And IPC doesn't pay to maintain our solar systems. (we do). Good deal for IPC. But that's not good enough, now they want to change their net metering system, so that the free energy they receive from our solar systems is credited back to us at lower rates than net metering! So we would put in more energy to get less credit back towards our IPC bills. They hoodwinked us, after we had solar installed on net metering! In other words, net metering was used to calculate how many solar panels we would need to supply our home energy needs. If IPUC doesn't stop this power grab by IPC, we could end up paying for our solar system, plus extra to IPC to offset their proposed lower rates of crediting us for the energy that we produce. (Ie, It wouldn't take long before our credits would no longer cover our energy consumption, even though we're supplying all the power!). This is grossly unfair, and an attempted power grab by IPC. I urge you to consider the citizens of our state, those who have installed solar, those who may in the future, and to vote NO on IPC's proposed change to how they want to change net metering for solar energy producing customers. The IPC proposal is the antithesis of helping our state become more energy independent, & move towards clean energy. Idaho salaries are notoriously low, and many of us went into debt to put in solar, because it's the right thing to do. Now please do the right thing yourselves and vote NO on IPC's new proposal. Thank you.

Unique Identifier: 164.165.206.42

Diane Holt

From: tcwolfenden@gmail.com
Sent: Tuesday, December 3, 2019 9:34 PM
To: Diane Holt
Subject: Case Comment Form: Teresa Cohn

Name: Teresa Cohn
Case Number: IPC-E-18-15
Email: tcwolfenden@gmail.com
Telephone:
Address: 300 May Rd.
McCall ID, 83638

Name of Utility Company: Idaho Power

Comment: I am writing to express my opposition to changes in Idaho Power's solar metering program.

- Many of us have budgeted for and installed energy infrastructure based on long-term financial planning and standing agreements with Idaho Power. It is essential that Idaho Power respect such agreements with customers, in transparent ways that respect personal expense. We have invested in both our own financial futures as part of our personal commitment to support renewable energy infrastructure for the state of Idaho.
- Given the severity of carbon emissions and climate change, we as a state should do everything possible to encourage expansion of solar power in our state, not discourage it. We see countries like England and Germany subsidizing and supporting the expansion of solar power in ways that we should replicate, not discourage.
- According to the Yale Climate Opinion Maps (2019), 81% of Idaho adults support tax rebates for people who purchase energy-efficient vehicles or solar panels, 83% of Idaho adults support funding research into renewable energy sources, and 62% of Idaho adults support requiring utilities to produce 20% of electricity from renewable sources. Idaho supports renewable energy. Idaho Power should invest in, and support renewable energy, too.

Unique Identifier: 164.165.206.42

Diane Holt

From: rangerider_45@outlook.com
Sent: Tuesday, December 3, 2019 9:48 PM
To: Diane Holt
Subject: Case Comment Form: Charlie Swearingen

Name: Charlie Swearingen
Case Number: IPC-E-18-15
Email: rangerider_45@outlook.com
Telephone: 208-896-5117
Address: 9526 Sleepy Hollow Dr
Melba ID, 83641

Name of Utility Company: Idaho Power Company
Comment: Dear Sirs;

In reference to Idaho Power's Net Metering Policy changes, I think existing customers should be grandfathered in and protected from Idaho Power's proposed changes. I am retired and live on a very finite income that decreases each year thanks to inflation. In trying to plan for the future I have invested \$65,000 in a solar power system designed to meet our electrical needs in our old age.

Currently, our solar system produces enough electricity that I don't have a power bill, but I still have to pay the bank for our solar power system. Now I learn from Idaho Power that they want to charge us more money, and I will have to pay a power bill. I will have to pay \$65,000 for the solar system as well. How will I pay for both when my youth is gone and I don't have the option of going back to work? This will put many elderly people in a very serious bind. If you have questions about my situation feel free to call and talk to me.

Respectfully,
Charlie Swearingen

Unique Identifier: 164.165.206.42

Diane Holt

From: kluckhohn@gmail.com
Sent: Tuesday, December 3, 2019 10:16 PM
To: Diane Holt
Subject: Case Comment Form: Richard Kluckhohnb

Name: Richard Kluckhohnb
Case Number: IPC-E-18-15
Email: kluckhohn@gmail.com
Telephone: 208-941-4186
Address: 2564 W Park Stone Dr
Meridian ID, 83646

Name of Utility Company: Idaho Power Company

Comment: The time to recover my costs in a solar system is 16 years under the current Net-Monthly metering program and thus this specific program must continue until I recover my costs or 16 years, anything less is a taking of my asset by Idaho Power, as commented at the public hearing THEFT.

The PUC must consider those who took out loans to finance their solar system, as putting such owner of solar system on the proposed NET-HOURLY program will likely cause that family to be upside down on their loan, their electrical bill will not be reduced and probably return to about 50% of their previous bills and thus the saving will not cover their land payment. Tis could easily cause a family to loose their home.

A perfect example is the gentle man who testified that he purchased a \$91,000 system and spoke with banks about loans.

The manufactured payment rate for exported power needs to be tested. If Idaho Power is saying our exported power is only worth \$.042/KWH (which is what they are saying) then the PUC should immediately order Idaho to stop charging customer more than \$.042/KWH plus a reasonable profit. This means that Idaho Power share holders must take an immediate assist reduction and loss (as Idaho Power is proposing to solar families like mine) to bring their cost of power in-line with the \$.042. If that rate is good the goose (we independent solar producers) it is good for the gander (Idaho Power). Their claim, as I have hear, is they can buy power for \$.027/KwH. If that is true then Idaho Power is over charging it customers and again, Idaho Power must write off the cost that exceed the \$.027/KwH rate. Idaho Power is talking out of both sides of its mouth, when it comes to market value of solar power. No Idaho Power customer should be paying more than this "\$.042" rate if that is the true value of the solar power. The truth is, they have manufactured a rate that obtain a desired outcome for Idaho Power executives and shareholders not for the customers of Idaho Power. There is no real transmission cost for solar power as it flows out of my home into the home next door. My solar system is the ONLY one in my subdivision.

Unique Identifier: 164.165.206.42

Diane Holt

From: blaise.g81@gmail.com
Sent: Tuesday, December 3, 2019 10:32 PM
To: Diane Holt
Subject: Case Comment Form: Darren Exon

Name: Darren Exon
Case Number: IPC-E-18-15
Email: blaise.g81@gmail.com
Telephone:
Address: 2372 E Mores Trail Dr
Meridian ID, 83642

Name of Utility Company: Idaho Power

Comment: I'm writing in reference to Idaho Power's desire to change their current net metering policy. My wife and I recently installed a solar power system in our home, and one of the key decision points in doing so was Idaho Power's current net metering program. Idaho Power's proposed change to that program would significantly impact our current investment, resulting in notable increases in our power bill over the coming decades. We are not necessarily against them changing the policy if they would do so in a manner that does not negatively impact current owners of solar systems in their service area. Maintaining the current net metering policy with current solar system owners, and applying the revised policy with future solar system owners seems very sensible, and fair to those who have already committed to investing in solar power. Please do not approve of this policy change.

Sincerely,
Blaise Exon

Unique Identifier: 164.165.206.42

Diane Holt

From: k2hurley@msn.com
Sent: Tuesday, December 3, 2019 10:35 PM
To: Diane Holt
Subject: Case Comment Form: Kathleen Hurley

Name: Kathleen Hurley
Case Number: IPC-E-18-15
Email: k2hurley@msn.com
Telephone: 2088632872
Address: 3392 S Ashbury Place
Boise Idaho, 83706

Name of Utility Company: Idaho Power

Comment: Idaho Power should not be allowed to reduce the one-for-one credits for solar customers.

They did NOT share in the cost of our capital improvement when we installed our solar panels. We pay the same monthly flat fee as all other customers for being hooked up to the power infrastructure but we allow Idaho Power to reduce its power demand. We should not be penalized by reducing our credits.

Sincerely,

Kathy Hurley

Unique Identifier: 164.165.206.42

Diane Holt

From: jenna.whitlock@gmail.com
Sent: Tuesday, December 3, 2019 10:52 PM
To: Diane Holt
Subject: Case Comment Form: Jenna Whitlock

Name: Jenna Whitlock
Case Number: IPC-E-18-15
Email: jenna.whitlock@gmail.com
Telephone: 2088667055
Address: 1511 N 11th Street
Boise ID, 83702

Name of Utility Company: Idaho Power Company

Comment: I live in Boise's North End – I found a patch of sunshine and installed a rooftop solar system on my home over 2 years ago. My system was purchased and engineered based on existing net metering policies that track production and usage on a monthly basis. The current settlement agreement would completely undercut my investment.

- I ask that the Idaho PUC reject the settlement and send the parties back to re-negotiate an agreement that is just, fair and equitable.
- No changes should be made to Idaho Power's net metering program until there is a comprehensive and independent study of the costs and benefits of rooftop solar. The current proposal is arbitrary.
- In any case, those of us who installed panels should be grandfathered in to the current net metering program. Further, systems should be grandfathered with the meter number and not just my account number. An expected increase in my home value was a major factor in my solar investment.
- Any implemented changes that may happen should become effective 30 days from the PUC's decision and should not take place retroactively. People who are under a contract for solar prior to the IPUC's decision should also be grandfathered.

The changes proposed in the settlement – hourly metering and a 4.4 cents per kWh -- will kill rooftop solar in Idaho. It would be impossible to economically justify rooftop solar given the terms of the current settlement. Please don't kill rooftop solar in Idaho – we need this option of renewable energy going forward to address the impacts of climate change in the State. Plus we Idahoans should have the ability to produce our own power.

I recently retired from a 35-year career with the Bureau of Land Management and was heavily involved in standing up renewable energy development on public lands. Hydropower and large scale solar and wind farms have significant impacts to the environment. Look at the situation with Idaho salmon – Idaho runs are on the verge of going extinct.

Why not use roof tops instead? Please preserve this option for Idaho. Thank you. Jenna

Unique Identifier: 164.165.206.42

Diane Holt

From: billiefarley@q.com
Sent: Wednesday, December 4, 2019 8:39 AM
To: Diane Holt
Subject: Case Comment Form: Billie Farley

Name: Billie Farley
Case Number:
Email: billiefarley@q.com
Telephone: 2084478842
Address: 15383 Cypress Street
Caldwell ID, 83607

Name of Utility Company: Idaho Power

Comment: I am opposed to the proposed changes for reimbursement of solar energy providers to Idaho Power. Residential solar power providers allow the power company to not have to maintain equipment not invest in the equipment from which they derive energy for their other customers. Keep the original agreement and compensation rates, please. Help Idaho move away from power plants like the natural gas one between Caldwell and Ontario. Keep your promises to residential customers who make the investment in equipment to provide clean energy to Idahoans.

Unique Identifier: 164.165.206.42