



IDAHO PUBLIC  
UTILITIES COMMISSION

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

COMMENT FORM

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

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

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

You may also post comments on our website:

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

Click on the "Case Comment Form" link

My family got solar panels  
in 2016 and it is important to do  
solar. It is unfair for people who  
have solar people who want solar  
and people who want a clean planet  
for solar to be even more unaffordable.  
Not every one can afford solar right  
now and even fewer after this is  
enforced.  
enforced.

Print Name Anise Welty Age 11 Sign Name Anise Welty  
Address 2309 Malad St. Phone Number (208) 559-3673  
City and State Boise, ID Zip Code 83705



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From: An Angry Citizen of Idaho

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Three ways how solar generation benefit the grid and the public  
#1 Peak Load Reduction: When everyone is cranking up  
the AC to fight the summer <sup>heat</sup>, solar generation is at its  
peak too!

#2. Cost to expand electricity production capacity through  
other means: solar customers offset the growing demand  
for more power plants!

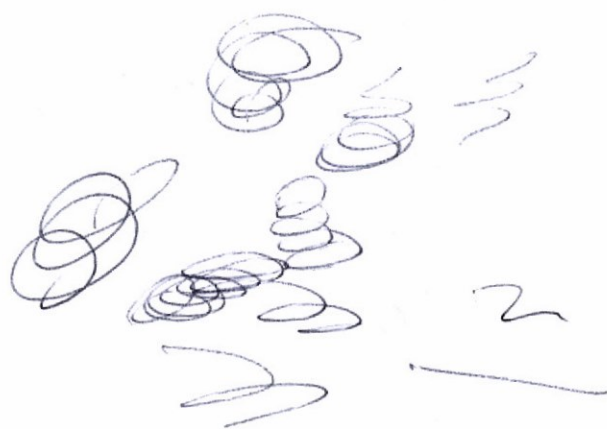
#3. Less transporting cost and overall loading of the grid:  
Just like the traffic is reduced on the highway when more  
people work where You Live!! Solar energy is generated  
where <sup>it</sup> is consumed!!

All over the world, companies pay premium to carbon credits. Solar  
customers should get PAID MORE for the carbon credits in each kWh ~~they~~  
~~any other form~~!!

Print Name Yen Lee Sign Name Yen Lee

Address 8019 W Blackberry Ct Phone Number 2087615708

City and State Boise ID Zip Code 83709





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I am the manager of 2 solar distributors in Idaho and supply the majority of solar in the state. Over the last year, I have watched our company grow in numbers as well as many of my customers, the installers. There are thousands of jobs currently in the Idaho solar market, and that number continues to grow at an exponential rate. The jobs are all livable wages in many different capacities. This proposal would kill this booming industry. It would eliminate the current and future jobs that only benefit Idaho. The Solar Industry is a benefit to Idaho and every Idahoian. The ONLY people that benefit from this proposal is Idaho Power cashing in on the public. As the public utility commission, it is your job to defend the public. Reject this bill and support the people of Idaho.

Print Name Brian Freeman

Sign Name 

Address 10319 W Brownstone

Phone Number 541-990-9171

City and State Boise ID

Zip Code 83709





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Please reject Idaho Power's request - they claim to be concerned about fairness - but what about the tens of thousands of dollars in investment by net metering customers that they are trying to invalidate - or the 2 million kilowatt hour credits accrued by net metering customers - nullifying or de-valuing that is absolutely unfair! As a result, I also request that existing net metering agreements be grandfathered-in.

Finally, I want to mention the PUC's responsibility to act in the public interest: Energy independence is a strategic resource for this nation. The National Renewable Energy Laboratory has estimated that 40% of our nation's energy needs could be met by rooftop solar - if only Idaho Power would work to incentivize it. The PUC could be a part of making that happen! Thank you for your time!

Print Name Jedidiah Thomet

Sign Name 

Address 11101 W. Sandhurst Dr

Phone Number (208) 371-4256

City and State Boise, ID

Zip Code 83709



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If you pass this bill, I look forward to the  
class action lawsuit against all parties involved.

Print Name Travis Laywood Sign Name T. L.

Address 16670 Ustick Rd Phone Number 208-880-6441

City and State Caldwell, ID Zip Code 83607



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I want to raise my concerns about the relationship between the power company and solar producers on ~~the~~ <sup>the</sup> shutting down power during work on powerlines. See Schedule 6 and Schedule 8 definitions. ~~By~~ <sup>They</sup> Schedule 6 conditions of purchase and sale #3 ~~There~~ Need reworked <sup>and</sup> power company lacks power off etc

Print Name Michael McBride Sign Name Michael McBride

Address 2502 Laure Lane Phone Number 208 585 1035

City and State Twin Falls, ID Zip Code 83301



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I am an Idaho Power Customer. I spent tens of thousands of dollars to put Solar Panels on the roof of my home. It would pay for itself after 15 plus years but would be green energy. For Idaho Power to change the terms now without knowing the actual costs we might be costing them is criminal! I question the process that has brought us to this point. This settlement is unfair to current and future solar users. This is a bad settlement agreement please get out of this. Why didn't effected customers of Idaho Power have the ability to give input into this process before this bad settlement?

Thank you for the opportunity to comment.

Print Name Barbara Shapel Sign Name Barbara Shapel

Address 2571 W. Willard St Phone Number 208-412-6147

City and State Meridian, ID Zip Code 83642

Idaho Public Utilities Commission      December 3, 2019  
11331 W. Chinden Boulevard  
Building 8, Suite 201-A  
Boise, Idaho 83714

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

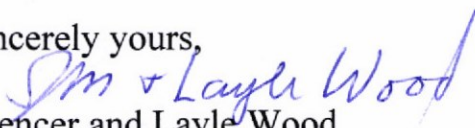
Dear Commissioners:

We are both long-term shareholders of Idaho Power Co. stock and folks who, in 2019, invested \$34,000 (less 10,200 tax credit) in our residential solar photovoltaic system. We are an all-electric home, and our system now provides ~ 40% of our electric power usage. During some summer months, **during daytime summer peak demand** we will produce a small amount of excess power, and we expect to be credited by the net-metering agreement at the same rate we are charged (~\$0.086/kWh), including foreseeable future rate increases.

We point out that the residential solar investment is expensive to us, but provides the utility company with sustainable "clean energy" without a capital investment by Idaho Power Co. or need for more transmission facilities.

For this simple reason, we ask that the commission **reject the proposed settlement of a reduced rate** for our exported power.

Sincerely yours,

  
Spencer and Layle Wood  
421 E. Crestline Dr.  
Boise, Idaho 83702  
cell: 208-860-9410  
email: spen\_wood@hotmail.com



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*We hope Idaho Power has Integrity*

Print Name Merrill Bastian

Sign Name Merrill Bastian

Address 16977 Bastian Ave

Phone Number 208-453-2175

City and State Caldwell, ID

Zip Code 83607

December 3, 2019

Idaho Public Utilities Commission,

As committed voters, consumers, Idaho Power investors, and long-time residents, we have observed Idaho Power to have slim interest in alternate forms of energy production. While it is fortunate that hydroelectric production is a good option for Idaho, we have seen that threatened by a couple years of drought. **We firmly believe individual citizens can contribute significantly to the generation of electricity for the Treasure Valley, saving costs for Idaho Power to generate it, and helping reduce climate change.**

Years ago, IP wanted to charge a huge monthly fee to solar users. Now they want to stiff them. While they claim they are solar friendly and use solar to power their offices, this move to reduce compensation to solar producers indicates otherwise. On their website they proudly claim to have enough power to serve customers through 2028. LAUGHABLE! Given the influx of people, and that 8 years from now is short range planning at best, that statement alone motivated us to add solar. **Compensation to citizens who, at their own expense, are willing to be energy producers and support a greener community should be done fairly, with deliberate, independent analysis.**

We appreciate past efforts of the Utilities Commission to hold IP accountable and supporting the broader view when profits clash with responsibility to maintain this beautiful state of Idaho.

Lee and Judy Klosterman

*elkofboise@msn.com*





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I request that The commission grandfather  
current Solar panel owners to the current  
program. Those of us have invested 1,000's  
of dollars to produce solar energy and  
are thus have contributed more than those  
who do not have solar

Print Name PATRICK BURKE Sign Name Patrick P Burke

Address 5462 W. Lockport Dr Phone Number (208) 426 8022

City and State Boise ID Zip Code 83703





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I feel this whole process is designed to make sure nobody ever installs solar power on their house again. I am reminded of Idaho Power asking for fair rates for the wind power installations and hey presto they got it and no more wind power was ever started in Idaho.

At the very least if Idaho Power installs by the hour meters they should pay a charge the rate actual value of the power for the hour it happens

Print Name Ilse Schreiner Sign Name Ilse Schreiner

Address 3711 S. Sunset Way Phone Number 208-362-2416

City and State Boise, ID 8 Zip Code 83709



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Idaho power wants to have 0 Carbon by 2045

1. Solar reduces their carbon at our expense
2. provides load smoothing at our expense
3. helps develop micro-grids at our expense
4. Idaho power as our battery is break even costs for them. They use water in dams
5. help us and Idaho power get to 0 carbon by keeping incentives in the right direction

Print Name Dick Bodily Sign Name Dick Bodily

Address 12836 W Gingen Creek Phone Number 208 376-8653

City and State Boise Id Zip Code 83713



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Click on the "Case Comment Form" link

The proposal as it stands is unethical  
and will destroy the solar industry in Idaho.  
This will lose thousands of jobs. Existing  
customers Absolutely need to be grandfathered  
in

Print Name Travis Lanham Sign Name [Signature]

Address 16420 N Chip Shot Ln 104 Phone Number (512) 241-9978

City and State Nampa ID Zip Code 83687



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I believe my investment in solar panels benefits the community, the world and Idaho power. I generate power in the summer when electricity is in high demand and expensive. I take my credit back in the winter when electricity is not in high demand. This means I am contributing to the economic stability of Idaho Power. I also pay toward the grid each month. Please do not let Idaho Power give me less credit than I earn.

Print Name

Patricia Blatter

Sign Name

P Blatter

Address

3399 W Breneman

Phone Number

(208) 401-4141

City and State

Boise ID

Zip Code

83703



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We installed 54 solar panels just a few months ago. We were excited about the tax incentives and the credits we were able to accrue for unused power we generated which we would be able to draw on during winter months. The net metering which was kilowatt for kilowatt is what influenced us to go solar. To change the original Net metering program on existing residential solar customers is unfair since we based our decision to go solar on ID Power's original terms & program. We were hoping our solar investment would be a good long term investment but to change the original terms on us would cost us thousands of dollars and that is a terrible thing to do to us. as my wife is retiring in a few days and I am retired on fixed incomes. I hope ID Power will be ethical and fair to the existing solar customers and grandfather us in to the original program we signed on to.

Thank you

Print Name Philip Carson Sign Name Phil Carson

Address 10 Burnett Dr. Phone Number 208-343-4381

City and State Boise, ID Zip Code 83716



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I DON'T THINK IDAHO POWER SHOULD LESSEN THE 1KWH FOR  
1KWH <sup>FOR</sup> ~~SOLAR~~ SOLAR. THE PEOPLE <sup>WHO</sup> ~~HOW~~ PUT ~~IN~~ POWER INTO  
THE GRID ARE HELPING SUPPLY RENEWABLE POWER. CHANGING IT WOULD  
BE <sup>LIKE</sup> ~~LIKE~~ A <sup>REGULAR</sup> ~~NORMAL~~ CUSTOMER. GETTING A BILL ADD SAYING  
I WILL ONLY GIVE YOU 80%. AND THAT IS NOT RIGHT. WE  
SHOULD BE GIVEN BACK WHAT WE PUT IN.

Print Name TRAVIS MANWKE

Sign Name 

Address 358 E BLACK HAWK DR

Phone Number 208 995 5625

City and State KUNA ID 83634

Zip Code 83634





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We made a very large investment in solar because it was incentivized and encouraged by the power company and the PUC and it was the right thing to do for our environment.

Now the decision to penalize everyone that did the right thing at the right time for the right reasons is WRONG.

Print Name Wendy Kurody

Sign Name

Wendy Kurody

Address 3029 N. 24th Way

Phone Number

208-336-4449

City and State Boise, ID

Zip Code

83702



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Case Number IPC-E-18-15

I am requesting the IPUC to deny Idaho Power's  
request at this time. I feel those who have solar power for  
residence for longer than a year be grandfather with the  
current system. Thank you for your time.

Print Name Samuel C. McEvoy Sign Name Samuel C. McEvoy

Address 1439 W. Elm Place Phone Number 208-870-9034

City and State Meridian, Idaho Zip Code 83641





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I am very opposed to the proposed rate structure, and find it unfair to those who have invested in solar. It also does a disservice to future generations by discouraging future adoption of solar power.

Print Name

Ilana Rubel-Paschke

Sign Name

Ilana Rubel

Address

2750 E. Migratory Dr.

Phone Number

208-385-7510

City and State

Boise ID

Zip Code

83706



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We recently invested in solar in Fall 2019.

It is unfortunate that the proposed agreement to lower rates will now make it difficult to see a return on our investment in the foreseeable future.

While we agree that a separate user class for solar users is fair, we do not agree with the proposed agreement terms and urge the IPUC to reject the agreement and work with Idaho Power to find a more equitable solution that doesn't unfairly penalize solar users.

Print Name Leah Kelsey Sign Name LEAH KELSEY

Address 433 E. Thurman Mill St. Phone Number 208-514-9892

City and State Garden City, ID Zip Code 83714



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Please keep the regulations and costs for solar and net metering as beneficial as possible to the homeowner. We need to encourage the use of a renewable energy resource. This is a large upfront cost of the homeowner who has the desire to invest in green energy resource.

Print Name Tara Thompson

Sign Name Tara Thompson

Address 5271 W. Sorrento Dr

Phone Number 208-420-9839

City and State Boise, ID

Zip Code 83704



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As a ~~retail~~ retail customer I would prefer that the current rates be maintained since a change would most likely impact my monthly credits negatively! If changes were made they should be grandfathered in to exclude anyone installed prior to the notification date of the change.

Print Name

Mark Moore

Sign Name

Mark Moore

Address

5740 W Night Sky Ct

Phone Number

719-474-9995

City and State

Garden City

Zip Code

83714



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I am for the Solar Industry as a whole. Understanding Idaho Power is a for profit company, making solar go down in value makes sense for them. There needs to be a better way to value Net Metering that is set to still being beneficial to Idaho Power along with the Solar industry. If Solar goes down to .04 cents per kwh then there will not be a Solar Industry at all. Can We work together to benefit renewable energy. To make it so it is stable and able to withstand in the long run.

Print Name Kate Kelley Sign Name [Signature]

Address 2918 N Woody Dr Phone Number \_\_\_\_\_

City and State Boise Id Zip Code 83703



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I Have sent a comment previously via Email but I am disappointed that the Facility is Too Small. It is difficult to hear standing in the Hall and standing for the duration is too much! I understand that a large crowd was expected and wish some thought had gone into planning for this important hearing. Audio extending to outer areas would have helped. Thanks

Print Name

Patrick Kurdy

Sign Name

Patrick Kurdy

Address

3029 N. 24<sup>th</sup>

Phone Number

208-836 4447

City and State

Boise

Zip Code

83702



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Please Review the following information  
in making your decisions concerning the future  
of solar in Idaho ~ Specifically Net Metering decisions.  
- Understand the Results of the Methy Mercury study  
currently being conducted in the Hells Canyon Complex by USGS  
- Review the current status of Salmon Runs in the Boise,  
Payette, Weiser, Owyhee, Snake Rivers.  
- Why is Idaho Power hiring lobbying/Public Relations  
groups (GS Strategies) and conducting research on current  
Net metering Customers and giving this information to Idaho  
Power PR efforts

Print Name Tuck Miller

Sign Name Tuck Miller

Address PO Box 2002

Phone Number 208 634-1893

City and State McCall ID

Zip Code 83638



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When we installed solar panels this past August (2019) our intention was two-fold: 1. Reduce our carbon footprint 2. Reduce our future energy costs. Idaho Power should be encouraging home owners and businesses to contribute to our state's grid in order to reduce greenhouse gases and pollution, and meet their supposed goal of "going green". ~~IF~~ PUC allows Idaho Power to go forward with this cut, the incentive to go solar will greatly be diminished. Worse ~~case~~ <sup>case</sup> and I am serious, worse case at least grandfather in current solar customers.

Print Name Margaret Gallagher Sign Name Margaret Gallagher

Address 2716 W. Madison, ~~83720~~ Phone Number 678-468-4674

City and State Boise, ID. Zip Code 83702





IDAHO PUBLIC  
UTILITIES COMMISSION

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

COMMENT FORM

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

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

You may also post comments on our website:

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

Click on the "Case Comment Form" link

Boise has 206 ~~day~~ sunny days per  
year. We should be providing  
more incentives for people to  
tap into solar power, not  
restricting incentives. I urge you  
to oppose these restrictions.

Thank you.

Print Name

Stephanie Bailey White

Sign Name

S Bailey-White

Address

4301 E Water Pocket

Phone Number

208-439-4145

City and State

Garden City

Zip Code

83714



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UTILITIES COMMISSION**

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It is only FAIR to pay solar generated  
power MAKERS at the SAME RATE  
you charge power consumers!  
This should be an accumulative  
total (not hour by hour) with "credits"  
rolling over for a full YEAR  
from the generated date.  
ie: Power generated 11/1/19 would be  
"good" until 11/1/20 ("use by" date)

Print Name Fawn Bell Sign Name Fawn LoBell

Address 914 N. Pasture Ave Phone Number 208 922 2109

City and State Kuna ID Zip Code 83634



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I recently invested \$15000 in a solar system  
under the understanding of recovering a 1 for 1  
net metering agreement. This is a true agreement  
and change is a breach of contract

Print Name Robert White Sign Name [Signature]

Address 430 E Water Park Phone Number 208 250 6438

City and State Garden City, ID Zip Code 83714



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Like a utility, homeowners with grid connected solar make their investment in power generation based upon the regulations in place. By changing such regulations, after customers have made investments destroys financial returns.

Idaho Power has failed to account for the positive externalities of solar - ~~reducing transmission loss~~ reducing transmission loss, localizing generation improving air quality. Dirty power generation disproportionately impacts poor and underserved communities. So why does Idaho Power want disincentivize distributed generation when it benefits the public?

As an electrical engineer, I can tell you that excess generation added to the grid will go <sup>to</sup> the lowest impedance - likely the house next door.

Finally, Idaho Power does not charge separate rates for remote cabins or other high cost consumers - Why Not?

Print Name JAKE MACARTHUR

Sign Name 

Address 1209 N 24th St

Phone Number 206 409-8104

City and State BOISE, ID

Zip Code 83702



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The number of people that took time out of their busy lives showing up this evening should tell you something about the "public interest" related to the way Idaho Power is dealing with distributed generation. What is currently happening and has happened is obviously flawed. The PUC needs to seriously reconsider this entire process. No current ~~or~~ or future customers should be transitioned to a new rate model until a fair compensation structure that actually values renewable generation is developed.

Print Name Alex McKinley

Sign Name

Address

1407 E. Jefferson

Phone Number

208 901 5167

City and State

Boise ID

Zip Code

83712



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Click on the "Case Comment Form" link

I'm currently in process of installing 53 panels on top of my  
roof. I've budget for a 10-15 year payback. I cannot  
afford to back out of the process at this time. Please  
grandfather us in.

Print Name Scott Pentzer

Sign Name 

Address 13037 W. Windy Meadow Ave

Phone Number 208-901-4402

City and State Boise, ID

Zip Code 83714





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As virtually all testimony noted, any  
change as <sup>announced</sup> proposed by Idaho Power  
that is approved by the Idaho PUC will  
be totally unethical and duly noted  
by the citizens of Idaho. Negative  
actions affecting the IPUC members  
might be expected.

Print Name

Richard Davis

Sign Name

Address

317 Arroyo Dr #2

Phone Number

208 478 9231

City and State

BOISE, ID ~~83720~~

Zip Code

83712



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It is not right for Idaho Power to renege on their obligation to pay those Idaho Power customers who invested in solar power systems the rates originally agreed upon under the net metering structure in effect at the time of installation and 'on line' solar power generation. To propose reducing the rate paid for solar power added to the grid by 50% is grossly wrong and totally unfair to those who <sup>made</sup> the financial commitment to ~~the~~ install solar panels on their homes because it was the right thing to do to make the transition to clean, carbon free power at a time when our planet is faced with the severely adverse effects of climate change on our earth's ecosystems <sup>which the human race clearly depend upon.</sup> If we are ever going to reach carbon neutrality and save our planet from the devastating effects of climate change, the PUC needs to reject Idaho Power's net metering proposal, and instead promote solar power at every level for a sustainable energy future. To do otherwise is despicable!!

Print Name STEVE JAKUBOWICZ

Sign Name Steven Jakubowicz

Address 908 N. 21<sup>st</sup> STREET

Phone Number (208) 863-1236

City and State BOISE, ID

Zip Code 83702

12/3/19

I ask the PUC to reject Idaho Power's proposal because it is the wrong thing to do at this critical time in human history!





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Click on the "Case Comment Form" link

~~Comments~~

If The PUC Allows the rate schedule Idaho Power is proposing, Private Solar Generation will come to an end.

I urge the PUC to look to the future. We are not going to Build any more dams, but renewable energy is just that, renewable.

Print Name

Richard McDowell

Sign Name

Address

200 N. 3rd St #904

Phone Number

208-871-0591

City and State

Boise, ID

Zip Code

83702



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Click on the "Case Comment Form" link

Please do not change the rate for new & existing  
individual on-site generation (via solar panels).

Do not let those who have invested in clean renewable energy  
for their homes & small businesses be penalized with  
higher energy bills.

Idaho needs all the solar generated energy it can get. Climate  
change has been created & continued through our nation's continued dependence  
on fossil fuels. By providing less than full retail rate to those  
with solar panels in Idaho ~~that will be a disincentive to solar energy~~  
IPUC will be ~~making~~ <sup>clean renewable</sup> making solar energy less attractive  
to individuals. As a result, our nation will have a slower transition to renewable energy.

We don't  
have time  
to wait

Print Name Adam Thompson

Sign Name Adam Thompson

Address 3819 N. Kay St.

Phone Number (541)-224-3984

City and State Garden City, ID

Zip Code 83714



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It appears to me that you think  
only well-off persons have solar panels.  
I survive on my teachers pension, \$24,000/yr.  
I chose to finance solar panels, paying  
\$179/mo for 20 years, because I feel  
its important to do my part for  
climate change/global warming.  
You are concerned that people with no  
solar power will pay too much. It is  
a choice most people can make, and I  
believe you have special plans for  
low income folks.

Print Name

Lori Poulton-  
Ramirez

Sign Name

Lori P Ramirez

Address

97 E Peach Springs Ct

Phone Number

408-206-2940

City and State

Meridian ID

Zip Code

83646



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IDP HAS NOT MADE A SUFFICIENT EXPLANATION AS  
TO THE REASON FOR COST INCREASE. "FAIR TO ALL CUSTOMERS..."  
IS HARDLY A TECHNICAL EXPLANATION.  
AFTER ~~THE~~ <sup>ALL</sup> ~~USERS~~ <sup><USERS></sup> GENERATORS PAID THE OVERHEAD FOR POWER  
FEED INTO GRID AND IDP CONTINUES TO CHARGE THE MONTHLY  
'CONNECTION MAINTENANCE FEE' THEY HAVE NOT DEMONSTRATED  
ANY CAUSE FOR INCREASED COSTS.  
OF PARTICULAR INTEREST TO ME IS THE DESTINATION OF IDP  
GENERATED POWER DURING PEAK HOUR USE IN SUMMER. I  
SPECULATE THE KWH CHARGE BY IDP IN EXPORTING POWER  
IN REGIONAL GRID IS 'SIGNIFICANTLY' MORE THAN THE LOCAL  
(IDAHO) RATES.

Print Name

R.A. ROBBINS

Sign Name

Address

16355 SHOSHONE ST

Phone Number

208 912 7984

City and State

POI ID

Zip Code

83705



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Click on the "Case Comment Form" link

1) Don't Advertise and count meeting your green initiatives off the backs of your constituents/members if you are not going to recognize the investment of building & buying solar panels.

2) Goals for Idaho Power show that you wish to provide 100% clean energy by 2045. If that is truly your goal you shouldn't disincentivize the public from helping create/generate clean power.

3) Cost for our home solar project was over \$20,000. Although this investment was never made to try to make money, our goal was not to have it be a complete loss and that eventually our investment would be offset overtime.

Print Name

Dr ANNIE KNIERIM

Sign Name

Address

538 W Mesa Grande Lane

Phone Number

402-210-5725

City and State

Boise ID 83702

Zip Code

83702



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We Did the Right thing, By going Solar  
please Do. The Right thing by grandfathering  
US in. the more we save the more  
we can give Back. With in  
Tons is Better for Boise.  
The PUC Promised That discriminatory Rates  
would not be the outcome. if changes are  
implemented that customers Solar investments  
Negative It would be discriminatory. Please Be True  
to your word.

Print Name

Noel & Lisa Gonzalez

Sign Name

*[Signature]*

Address

2037 S Surrey Road

Phone Number

206 499-1203

City and State

Boise ID

Zip Code

83709



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UTILITIES COMMISSION**

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Click on the "Case Comment Form" link

As I'm sure many others will testify tonight, I purchased a solar energy system in 2018 on the good faith that my system will pay for itself in 20 years. The restructuring of the credit structure propose by Idaho Power will greatly impare my return on investment, and given that my on-site generation is no burden whatsoever - in fact, it is a benefit! - to Idaho Power's grid, I must conclude that this ~~restructuring~~ impact on my investment is the primary purpose of this restructuring. It is unethical and immoral to penalize industrious, self-sufficient and forward-thinking citizens for trying to create a better world, and I implore the Commission to reject Idaho Power's immoral proposition.

Print Name Travis Hoogendoorn Sign Name Travis Hoogendoorn

Address 4810 N. Leather Way Phone Number (616) 990-5591

City and State Boise, ID Zip Code 83713





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I made comments on-line this afternoon but wanted to emphasize the definition of "existing" solar producers. I recently (Oct 2019) signed a contract with Auric Energy to install a solar system. While I have not signed a net metering agreement with Idaho Power as my system is not "live" yet, it will soon be doing that. I believe that those in my situation should be considered "existing" solar producers as there is no way I can get out of my contract with Auric or with the financing contract I have signed. ~~I encourage the IPUC~~

Print Name Barbara Forderhase

Sign Name

Barbara Forderhase

Address 2157 E Walling Dr

Phone Number

208-433-9548

City and State Boise ID

Zip Code

83712



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This Spring, my husband and I invested in a rooftop solar system. The system was expensive, costing \$17,000. To be able to afford it, we took out a \$15,000 loan from the state of Idaho, in addition to paying the remainder out of pocket. This is a very hefty amount of debt that we calculated would be justified based on the projected payback period. <sup>seeking to</sup> In changing the net metering reimbursement, ID Power undermines ~~the~~ our ability to afford this system. We feel as if the rug is being pulled out from under us. This change would be hugely costly to us and takes value from our investment. We are giving power to the company, which helps expand their capacity, and they propose to profit from it without compensating us. This is grossly unfair.

In addition, we feel the company is actively seeking to discourage the ~~generation~~ of sustainable power which is desperately needed to combat climate change. ~~They should~~ the IPUC should demand that ID Power <sup>the feasibility of</sup> increases <sup>customers to</sup> generate their own power, in the interest of the greater community and global good.

Print Name Heather Steele

Sign Name Heather Steele

Address 520 E Jefferson St.

Phone Number 208-794-6474

City and State Boise ID

Zip Code 83712



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I cannot fully express just how opposed I am to Idaho

Power's proposed changes to rate reimbursement for solar.

We just invested \$17,000 in solar this summer, with the

understanding that we would recoup the investment in electricity

savings over time. Idaho Power's proposal means we would never

recover our investment, which means it would all go into their

by my providing ID power free electricity

pockets. This is grossly unfair. If Idaho power is concerned

about solar, they should invest in solar, not fight it.

Thanks for considering my comments

Print Name MATTHEW KOHN

Sign Name 

Address 520 E JEFFERSON ST

Phone Number 208-<sup>342</sup>~~446~~-3568

City and State BOISE, ID

Zip Code 83712



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I am an Idaho Power customer and have an existing solar power system w/ a net meter. My system over produces my use. As such, Idaho Power permanently benefits from my free electricity through my over production. At the very least, the one for one trade on power should not be altered in any way for existing users. As I understood it, with the slow reduction in value of my production proposed, I could be paying Idaho Power to receive my free power. This proposal is not reasonable, just, or fair. On the broad stroke all rates should encourage micro generation and incentives to diversify our power system. It only makes sense.

Print Name Dan Skinner

Sign Name 

Address 5030 W Redbridge Ct.

Phone Number 208-606-8255

City and State Boise ID 83703

Zip Code 83703



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Idaho PUC should perform cost/benefit study,  
by independent parties, to calculate any rate changes  
necessary to maintain their transmission system from  
effects of ~~no~~ onsite solar generation. The recent rate  
study was arbitrary and made behind closed doors,  
with no basis in ~~assumed~~ actualities or reality.  
For contrast the following state PUC's have performed  
this study, and have concluded ~~net~~ 1:1 net metering  
outweigh the costs; Vermont Public Service Department,  
Nevada PUC, Mississippi Public Services Commission,  
Minnesota PUC, Main PUC. The Idaho PUC should  
at a minimum study the problem, prior to settling  
an agreement. P.S. I attended the hearing but had to leave  
before I could testify. Thanks.

Print Name Thomas Ellestad Sign Name T Ellestad

Address 3500 Sycamore Dr. Phone Number 208-559-1885

City and State Boise ID Zip Code 83703





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It is wrong for ID Power to penalize those who  
decided to do something to improve the environment &  
make an investment in solar. I purchased my system  
outright and have a grid-tie system so am  
effectively part of ID Powers generation system. But  
ID Power did not have to pay for my system nor do  
they pay to maintain it. Therefore, their capabilities  
for power generation increased w/o any capital  
investment on their part. From a financial  
standpoint, they are discouraging those in the  
future who wish to invest in solar by lengthening the  
payback period. The way ID Power bills customers  
who have solar should not be changed.

Print Name Mike Van Kirk Sign Name [Signature]

Address 966 Hialeah Phone Number 208 371 1411

City and State Eagle, ID Zip Code 83616



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Click on the "Case Comment Form" link

A fair and just solution to Idaho Power's  
approach to solar net-metering must  
include the following:

- A complete third-party study of the  
costs and benefits of rooftop solar

- Grandfathering solar owners as of ~~the~~  
30 days AFTER the final settlement of the case

- Transparent communication to ALL Idaho  
Power customers

Print Name

Jessica Benson

Sign Name

JM

Address

366 E. Old Skyline

Phone Number

208-577-7716

City and State

Boise

Zip Code

83706





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Idaho Power's plan to change rates on solar customers is discriminatory and unfair. They are trying to profit from my investment - partly based on their encouragement - and essentially devalue my solar system. The process of this request from I.P. to the IPUC has been shrouded with secrecy, and purely based off biased opinion, not factual data from a neutral party. How would I.P. feel if we, as solar customers, say we wanted them to pay us more for our energy? Probably not ~~allow~~ allow it due to the agreement already in place. I.P. should not be able to change an agreement just to benefit their bottom line.

Print Name Sean Manion Sign Name [Signature]

Address 7750 S Hidden Valley Phone Number 208-906-4161

City and State Boise ID Zip Code 83709



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UTILITIES COMMISSION

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I recently had Solar Panels installed at my residence. The system was designed to cover almost 100% of my usage at approximately 24Kw monthly. I've also installed new appliances i.e. High efficiency washer, dryer, Hot Water heater, and HVAC HEAT Pump all to support a greener foot print. <sup>In concert</sup> Along with Idaho Power's ~~plan~~ plan to be green by 2045. ~~For~~ I paid for a transformer upgrade to get permit me to be able to connect my solar <sup>an approximate</sup> cost of \$2500. ~~pp~~. Thus upgrading the infrastructure to support the solar connection to Idaho Power's Grid. I turned on the system once the "NET METER" was installed. \* THE BOTTOM LINE I would like to see those that have solar turned on already to be Grandfathered to the current 1Kw up to Kw down Rate.

Print Name Dallas J. Snyder Sign Name [Signature]

Address 2494 Old Oregon Trail Road Phone Number 208-594-2956

City and State Mountain Home Idaho Zip Code 83647

My name is Terry Maret and a resident at 4083 Argonaut in Ada County. I have been an Idaho Power customer for over 30 years.

I have submitted written comments regarding the Idaho Power settlement proposal and would like to take this opportunity to emphasize a few important highlights of that letter.

We installed a roof-top 9 kW solar system back in the spring of 2017. **This was a significant long-term (25yr) capital investment for our family based on a design of daily net metering.** As designed, it will take about 12 years before we realize any return on our investment. The proposed hourly rate metering and 50% reduction in net metering credit will most certainly extend the number of years until we see a return, if any, on our investment.

**Idaho Power did not help fund any of our solar installation so why should they be allowed to change the rules to profit off our investment?** An expected increase in home value was also a major factor in our solar investment decision. In order to protect these investments, systems should be grandfathered along with the meter number attached to the residence so when selling the home net metering benefits will be realized by new home owners.

**Where is the comprehensive study of cost and benefits of on-site generation that Idaho Power was ordered to produce?** Until such study has been completed and evaluated by all affected parties, the settlement proposal is arbitrary and capricious.

**Idaho Power's proposal is unfairly singling out solar customers which only make up less than 1% of their 560,000 total customers.** Idaho Power contends that because net-metering solar customers reduce the number of kilowatt-hours they purchase from the utility they avoid paying their fair share of fixed costs. Net-metering solar customers provide power to their neighbors and can help reduce the need for expensive transmission and distribution infrastructure necessary to move electricity from power plants that may be hundreds of miles away. This is especially true during summer when peak power demand is highest, which coincides with peak output from solar systems that can supplement our local power needs.

**Idaho Power has a goal of 100% clean energy by 2045...so why are they attempting to penalize those who are doing their fair share to reach such a goal?** For your information, solar now employs more people in the U.S. electric power sector than oil, coal and gas combined. Idaho needs to pass legislation to offer more incentives to encourage solar systems that will provide new job opportunities. The settlement proposals will jeopardize this growing industry in Idaho and cast a shadow of uncertainty in the marketplace. What will happen to warranty work for existing solar systems if solar companies leave the Treasure Valley because of lack of jobs.

**Every Idaho family, school and business should have the right to go solar on their own property if they so choose, and they deserve fair net metering compensation and predictability from their utility for making that investment.** This settlement clearly indicates that Idaho power is attempting to discourage rooftop solar and monopolize profits. Traditional ways of doing business will certainly not address climate change impacts. Institutions and utilities should be encouraging the development of alternative energy sources and not penalizing those who feel we can do better to sustain our planet and way of life.

THE JOURNAL OF THE AMERICAN MEDICAL ASSOCIATION  
PUBLISHED WEEKLY  
CHICAGO, ILL., MAY 1, 1930

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IDAHO PUBLIC  
UTILITIES COMMISSION

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

COMMENT FORM

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

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

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

You may also post comments on our website:

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

Click on the "Case Comment Form" link

Dear Commissioners,

Solar generation of energy is good for the environment.

Removing incentives or creating barriers to adoption does not help our environment.

I urge you to adopt only solar friendly rates & policies for the sake of our children, grandchildren, & environment.

The current settlement does not meet 'solar friendly' status. Please revise the settlement accordingly.

This settlement will effectively end solar energy generation in Idaho.

Thank You.

p.s. I ~~am not~~ do not have a solar installation, but am grateful for those who do.

Print Name Greg Daggett

Sign Name Daggett

Address 13292 W Telemark St

Phone Number 208939 8784

City and State Boise ID

Zip Code 83713



**IDAHO PUBLIC  
UTILITIES COMMISSION**

IPC-E-18-15  
Boise, Idaho  
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I have been a net meeting user for 2½ years. We entered into the program to level our utility bill as we are now retired.

I feel its unjust and not reasonable that the investment I have made be undermined. I had planned my investment would take 10 years to break even. Now the proposed new rate schedule would at least double the time it would take to recover my \$15K investment.

I feel any change in the rate structure after we entered net-metering would be a breach in good faith by Idaho Power. This settlement appears to only benefit Idaho Power and puts a huge burden on current net meeting customers.

Print Name James Jacobsen Sign Name James Jacobsen

Address 12361 W Bowmont St Phone Number 208-376-6168

City and State Boise - 83713 Zip Code 83713



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UTILITIES COMMISSION**

IPC-E-18-15  
Boise, Idaho  
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I am a single, self-employed provider for my family. I invested in my solar panels using the information & agreements in effect in 2017. I URGE the Commission to grandfather existing <sup>solar</sup> customers. AND urge the Commission to do everything necessary to make solar energy affordable to future customers. Please help our children have an opportunity to clean up the environmental mess we created & they are inheriting

Print Name

GLENDIA BELL

Sign Name

Address

2000 S. Longmont

Phone Number

208 250 7670

City and State

Boise, Id

Zip Code

83706





IDAHO PUBLIC  
UTILITIES COMMISSION

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

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I've been ~~been~~ kicking around "going solar" for several years.  
A meeting and an outcome like this new "agreement" <sup>are</sup> precisely  
why I haven't invested in solar. This new policy will throw  
ice water on any viable solar market in Idaho.  
Well played Idaho Power.

Print Name Kurt Ziegler

Sign Name [Signature]

Address 1405 N 22nd St

Phone Number 208.859.6295

City and State Boise, ID

Zip Code 83702



IDAHO PUBLIC  
UTILITIES COMMISSION

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Boise, Idaho  
12/03/19

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My husband and I spent a considerable sum to get solar energy installed on our roof. We did this because we are hoping to rely less on power generated by dams, since dams have harmed salmon populations in the Northwest. We don't want Idaho Power to limit the future solar customers from the incentives to generate power. All humans need to reduce their carbon footprint on the earth, and solar power is less harmful to the planet and her numerous species. Idaho Power is trying to make the future of solar power not profitable to individual customers.

Chris Walser  
Print Name Ashley Davis Sign Name Ashley Davis  
Address 1606 N 20<sup>th</sup> Phone Number 208 866-3667  
City and State Boise ID Zip Code 83702



**IDAHO PUBLIC  
UTILITIES COMMISSION**

IPC-E-18-15  
Boise, Idaho  
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Click on the "Case Comment Form" link

With The proposed agreement, we feel we will  
be force to move our operations out of Idaho  
Especially if The Rocky Mountain Power request is  
also approved. we roughly have installed about 500  
systems in Idaho over the past 6 years. Please  
reject this proposal & look for other options negotiating  
states use.

Big Dog Renewable Energy

Print Name Bill Donnelly Sign Name Bill

Address 670 Pleasant Ridge Phone Number 208 242 3352

City and State Pocatello, ID Zip Code 83202



IDAHO PUBLIC  
UTILITIES COMMISSION

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

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Click on the "Case Comment Form" link

~~By Changing the Rate Structure~~ By Changing the Rate Structure  
ID. will devalue homes. I pay more Taxes + Insurance  
now that I have solar power. by charging  
Solar owners for the power we produce IP.  
is discouraging any future solar power owners.  
Grandfathering is NOT the answer! When/if  
we sell our home the solar will not be a  
selling point. who want to buy a home with a  
liability on the roof? we will still pay higher  
insurance costs for levels that will be basicly  
obsolete. Please stop this proposal completely!

Print Name Sherry Lane Jennings Sign Name Sherry Lane Jennings

Address 5132 S. Canal Bluffs Way Phone Number 208-713-1948

City and State Boise ID Zip Code 83716



IDAHO PUBLIC  
UTILITIES COMMISSION

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

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Click on the "Case Comment Form" link

Please grandfather in current solar customers!  
It's unethical to change the rules after we've made  
our investments. My payback was 15 years. Now  
with the proposed rates, payback won't happen in  
my lifetime. The impact on Idaho Power's  
profits would be minimal with grandfathering  
us in. Other states grandfather current customers.  
Do the right thing!!

Print Name Patricia A. Merrill Sign Name Patricia A. Merrill

Address 7351 W. Old Country Phone Number 208 5070416

City and State Boise ID Zip Code 83709



Jeff Fereday and Kay Hummel  
420 E. Crestline Drive  
Boise, ID 83702  
[jcfereday@gmail.com](mailto:jcfereday@gmail.com)  
[kayhum@cableone.net](mailto:kayhum@cableone.net)

December 2, 2019

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

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

Dear Commissioners:

We are residential customers of Idaho Power Company (“IPCo” or the “Company”). Beginning in 2016, with additional panels and a new inverter in 2018, we have invested over \$28,000 in a solar photovoltaic system at our Boise home.<sup>1</sup> The Company’s proposed changes to its net metering program in this proceeding would substantially undercut our expected return on this investment and, we believe, constitute an unjustified windfall to the Company and its shareholders. But beyond that, and more important as a public policy matter, is the fact that the Company’s proposal would have a severe chilling effect on the development in Idaho of distributed solar and other customer-owned distributed generation (“DG”) resources.

We respectfully request that the Commission not adopt or approve the October 11, 2019 Settlement Agreement entered by IPCo and others (the “Settlement”), not impose the Settlement’s proposed new rate structure applicable to DG resources, and hold the matter in abeyance pending further study. Rooftop solar in Idaho is in its infancy, and this proposal by Idaho Power Company likely will throttle it. Rooftop solar today has been adopted by some 5,000 of the

---

<sup>1</sup>The total cost of the system, which was paid to AltEnergy, Inc. as supplier and installer, was \$28,707.00. With the federal tax credit and a state tax deduction, the cost to us (after a five-year amortization) will be approximately \$18,000. In evaluating the costs of IPCo’s proposal, it would appear that the higher number would be appropriate because that is what went into Idaho’s economy. In evaluating the cost to our investment posture, the lower number, adjusted for the timing of tax savings, would be appropriate.

Company's customers—about 0.01% of its customer base—and it accounts for a miniscule portion of the Company's installed capacity. The effect, financial or otherwise, of private rooftop solar on the other 99.99 percent of ratepayers cannot be significant. On the other hand, distributed solar is a step in the right direction for the environment and, we submit, for IPCo's customer base generally; it certainly carries part of the load toward the Company's "100% clean energy" aspiration. The Commission should take no steps to thwart the development of customer-sponsored rooftop solar in Idaho.

DG's effect on other ratepayers is typically based on the argument that the revenues they pay for the electricity they still purchase from the utility may not be covering an adequate share of fixed costs, such as transmission—in other words, "that net metering customers are not purchasing sufficient kWh to cover fixed costs," and that "an additional measure is needed to prevent a cost shift from occurring."<sup>2</sup> Presumably, this is IPCo's argument, even though the Company has not yet made a case for this, much less a convincing one. In any event, studies by the Brookings Institution and others have concluded that such impacts become meaningful only when the penetration of rooftop solar approaches an installed capacity of around ten percent. In Idaho, the current number reportedly is no more than about 3.5 percent. As stated in an exhaustive analysis of this issue by the economists at Lawrence Berkeley Lab, "for the overwhelming majority of utilities, current PV penetration levels are far too low to result in any discernible effect on retail electricity prices, even under the most pessimistic assumptions about the value of solar and generous assumptions about compensation provided to solar customers (e.g., full NEM [net metering] with volumetric rates)."<sup>3</sup>

Furthermore, even if DG in the Company's service area were causing increased costs to other ratepayers, any rate structure change to address this should compensate these ratepayers for these exact costs, not the Company's shareholders. There is no indication that the structure proposed here, which plainly would penalize the solar power generators to the point of being confiscatory of their investments, would be tailored to compensate for such effects and would not simply enrich shareholders.

We contend that neither the Company nor the Commission has enough information yet to make such a momentous decision. IPCo has not completed the

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<sup>2</sup><https://www.infrastructureusa.org/wp-content/uploads/2014/12/fig2014finalreport-141113033126-conversion-gate01-1.pdf>

<sup>3</sup><http://eta-publications.lbl.gov/sites/default/files/lbnl-1007060.pdf>



study the Commission ordered, and has not released any analysis it may have done for public review and comment. In sum, there is no need to rush into this decision, especially absent a thorough cost-benefit study such as the one the Company is obligated to produce. We believe that any analysis the Company or the Commission ultimately engages in on this subject should be available for review and should cover all relevant issues, such as those set forth below.

To summarize our central requests, we urge the Commission to:

- 1) reject the proposed Settlement and hold this matter in abeyance;
- 2) order the Company to complete and make available to the public the study specified in the Commission's June 1, 2018 Order 34604, Case No. IPC-E-17-13, which study is to evaluate the costs and benefits, both to the Company and to other customers, of net metering relative to DG, and particularly residential on-site generation;
- 3) ensure that the study includes, in addition to the above, at least the following analyses:
  - a. the value of DG over the next 25 years, to the Company and its ratepayers, in helping to meet Company's stated goal of achieving 100% "clean energy" by 2045;<sup>4</sup>
  - b. the current value of the investment in generating plant represented by all the DG involved in the Company's net metering plan, and the Company's cost of replicating this amount of installed capacity with solar or other energy sources;
  - c. the actual transmission and other fixed costs incurred by the Company or ratepayers arising from DG-produced electricity;

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<sup>4</sup>The Agreement expressly avoids assigning any "environmental benefit" to rooftop solar. This is unacceptable, particularly where the Company itself claims to be putting resources into clean energy, presumably to gain their environmental benefits. Existing DG resources should not be hamstrung, and future DG resources effectively blocked, by this proposed new rate schedule while the Company supposedly figures out how to bring on line cost-effective clean energy resources. These clean energy resources are here today, delivering an environmental benefit that the Company, we contend, should be compelled to value in this process.

- d. the relative firmness, and the relative interruptibility, of DG in the Company's system as compared to the energy from generation sources from which IPCo might be able to purchase on the retail or wholesale markets;
- e. the higher costs, if any, borne by non-DG IPCo customers as a result of having DG systems producing power for the Company's grid under the current, one-for-one net metering arrangement;
- f. the benefit to the Company arising from those DG owners who annually produce and provide to IPCo more electrical power than they consume—thus producing excess electrical energy that cannot be used by the producer and for which, under the present system, there will be no credit or compensation from IPCo—including an explanation of whether this benefit will accrue to other ratepayers or to Company shareholders, and in what amounts;
- g. the revenues that will accrue to the Company from reducing the net metering credit by some fifty percent, including an explanation of whether these revenues will accrue to the benefit other ratepayers or to Company shareholders, and in what amounts;
- h. an explication of the reasons for, and implications of, calculating the net metering credit on an hourly basis rather than a monthly basis;<sup>5</sup>
- i. losses to investment-backed expectations accruing to existing DG owners who currently provide net metered electricity to IPCo should their net meter credits be reduced to approximately 50% of what they now are;

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<sup>5</sup>The Agreement calls for "net hourly billing" as follows: "At the end of each hour, consumption and exports within the hour will be netted and net hourly exports will be compensated at the Export Credit Rate," which is proposed to be calculated by a method involving such elements as the avoided energy, capacity and transmission and distribution costs; avoided line losses. The Export Credit Rate does not factor in environmental benefits or integration costs. The Agreement also states that "Schedule 6 and Schedule 8 customers will be compensated for net hourly exported energy at the Blended Base Energy Rate for their respective customer classes." The Blended Base Energy Rate is described as "the total revenue to be collected through the base energy charges for each respective class divided by the total forecasted annual energy for each respective class." These calculations are difficult to parse, and we urge the Commission to insist that they be made clear with specific examples and formulae. And above all, we need to know how these rates and the hourly billing schedule will affect the economics of rooftop solar. IPCo should be required to answer this question fully and fairly.

- j. the economic impact, including the loss of commerce and jobs in the Company's service area, of a diminished solar equipment sales and installation industry that will result should the Company be permitted to reduce net metering credits by some fifty percent; and
- k. the economic impact on home values if the net-metering credit now in place, and therefore the current value of a rooftop solar system, cannot be passed on to a purchaser of the home.

The public, including IPCo's ratepayers, will benefit from any meaningful effort to reduce carbon emissions and speed the transition to clean energy. The effort to make this transition is in the public interest, which is another reason the Commission should not adopt the Settlement and, before making a decision, insist on a full display of all costs and all benefits of net metering and DG energy production (including, without limitation, each of the above items). Uncertainties should be resolved in favor of encouraging development of solar and other carbon-free energy sources. The current proposal, particularly the idea that IPCo would begin the process of substantially devaluing credits, is going in the opposite direction.

While our home's full system has been functioning for just over a year, it appears we will be generating and sending into the grid slightly more electricity than our annual consumption. We designed it to produce enough to cover all of our electrical demand, but recent upgrades to our air conditioning system and other efficiency measures have contributed to this situation. In any event, it stands to reason that at least some residential solar systems that are designed to meet all of the home's annual electrical demand in fact will, like ours, produce more than 100% every year, thus generating credits we never actually use.

We are not asking the Commission to compensate rooftop system owners for this unusable, extra energy credit (even though the Company receives this energy for free, with little or no transmission cost<sup>6</sup> and sells it at retail rates); their decision to aim for a "100% system" was their choice, taking a chance that they would overshoot somewhat. But we are asking that you address this situation and devise a way to calculate the revenue IPCo is earning from this overage represented by unusable credits. Such a benefit should be factored into the overall analysis of the

---

<sup>6</sup>It is our understanding that electricity pushed to the grid from a home's photovoltaic system is used at the nearest location needing supply—that is, the neighboring homes.

impact of rooftop solar on the Company and its customers, and its financial benefit should accrue to other customers.

The Company's approach dodges other important questions, such as the actual fixed costs (if any) accruing to the Company or other customers involved in receiving otherwise free electrical supply from private solar systems, the revenues the Company receives from selling excess power from these systems, and the role these systems play in reducing both generating and fixed costs associated with meeting peak summer demand. Idaho Power's answer to whatever problem it perceives here is to ask this Commission to impose conditions that appear to be a windfall to IPCo and its shareholders while delivering a crushing blow to future development of distributed energy sources. There is no fairness or public interest in this approach. Before entering any order in this matter, the Commission should ensure there are answers to such questions.

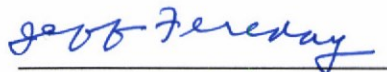
IPCo began this proceeding by asking the Commission to establish a separate rate class for net-metered customers, ostensibly to address the question of unfair cross-subsidy. The Commission obliged, and now we see what the Company wants to do with this customer class, which is to reduce its relevance essentially to extinction—to make the installation of rooftop solar so outlandishly expensive that few, if any, IPCo customers will opt for it in the future. Such a policy is not in the public interest or the interests of other Idaho Power customers. Nor, of course, is it consistent with the Company's stated goal to become a 100% "clean energy" enterprise in the next twenty-five years.

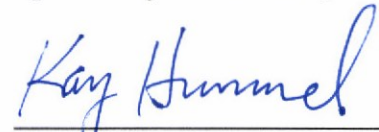
We recognize that the Company likely sees this as a simple rate-making matter, in which a utility is seeking to protect the rate base on which it earns a return; private rooftop solar systems are not in its rate base. However, we ask the Commission to consider the impact that adopting the Company's position will have on the continued development of solar energy in our state. Here we have customers making substantial investments that will carry nowhere near the rate of return on investment the Company enjoys as a matter of law and IPUC policy. We believe most of these consumers made these investments in significant part because they see them as a small but meaningful step in what should, and we hope will, become a nationwide effort to transition from carbon emitting energy sources. We ask that the Commission initiate a process to classify DG in a way that does not discourage solar power development. It may be that this will entail a new way of structuring the relationship between the utility and its customers, or a new way of evaluating a utility's rate base, or its rate of return. But surely there is a way to allow the utility

to remain viable while still encouraging—or at least not undermining—the emerging energy sector consisting of voluntary, customer-financed rooftop solar.

We ask the Commission to deny the Settlement and direct IPCo to complete a rigorous and transparent analysis, which includes input from all stakeholders, to address the issue of what the Company should pay for excess power from rooftop solar, and how independently-financed solar can be encouraged to be a part of the Company's energy production portfolio.

Respectfully submitted,

  
\_\_\_\_\_  
Jeff Fereday

  
\_\_\_\_\_  
Kay Hummel

cc: Governor Brad Little