

Idaho Public Utilities Commission  
P.O. Box 83720  
Boise, ID. 83720-0074

January 28, 2020

Dear PUC Commissioners,

I thank you for listening and truly hearing the many customers who testified at the hearings on case IPC-E-18-15, as reflected in your ruling.

On January 10<sup>th</sup>, Idaho Power filed a Petition for Reconsideration. As a homeowner with solar PV net-metering and as a retired electrical engineer, I am submitting comments in response to that for your consideration.

- 1) In part A, page 6, Idaho Power claims, "...evidence...supports that the parties did in fact conduct a comprehensive study."

In fact, the study of costs and benefits is incomplete, including two benefits and one cost. Avoided T&D costs, which Idaho Power claims accounts for 2/3<sup>rd</sup> of its cost of delivering electricity, is not accounted for. This is potentially a large number!

- 2) Also on page 6, regarding Grandfathering, Idaho Power claims, "Evidence in the record also demonstrates that the public received adequate notice regarding the potential for fundamental changes in this docket. Regardless of this fact, the Commission's decision to grandfather existing customers effectively moots this issue."

Customer ROI calculations were made long before this docket was filed, in many cases. I installed my solar PV net-metering system in June 2016. I am surely not the only such customer.

Also, the proposal to change rates exceeds the scope of the PUC's order to **STUDY THE COSTS, BENEFITS, AND COMPENSATION OF NET EXCESS ENERGY SUPPLIED BY CUSTOMER ON-SITE GENERATION**, not to actually change rates. Rate changes should occur only following a Rate Case.

- 3) Solar net-metering customers are still well below 5% of total customers in Idaho Power's service area. We have time to conduct a study of costs, benefits and proposed compensation in an open, inclusive manner, which will also help ensure that customers are duly aware of possible future rate changes. This will not negate, but rather build upon, the

work done to-date between Idaho Power and the Intervenors to establish solar net-metering benefits and costs. I applaud your decision to allow transparent proceedings.

Having read the PUC's Final Order 34509 following public testimony for IPC-E-18-15, I respectfully request a clarification on two items.

- 1) If I sell my house, will my credits follow me to a new residence? If I am not classified as a Schedule 6 or 8 customer in my new residence, will my 1400kWh of credits still be available to me?
- 2) Are no-export customers exempt from the rate changes that were proposed (e.g., all solar power generated at a residence is consumed behind-the-meter)? Put another way, are no-export customers not in Schedule 6 or 8? In what customer class would they be?

With Sincere Gratitude for Your Service,

Lisa Hecht  
4920 E. Sagewood Drive  
Boise, ID. 83716

## Diane Hanian

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**From:** LISA HECHT <heartfeltsong@msn.com>  
**Sent:** Tuesday, January 28, 2020 1:41 PM  
**To:** Diane Hanian; Diane Hanian  
**Subject:** RE: Response to Idaho Power's Petition for Reconsideration of IPC-E-18-15 Final Order

I'm sending an additional comment regarding Vote Solar's Petition regarding IPC-E-18-15 Final Order.

Dear Idaho PUC Commissioners,

I support Vote Solar's reconsideration asking for all customers to on the 1:1 net metering program until Idaho Power does the study.

It gives more certainty to the potential customers, and helps give Idaho Power an incentive to do the study quickly.

Sincerely,

Lisa Hecht  
4920 E. Sagewood Drive  
Boise, ID. 83716  
208.331.2159

**From:** LISA HECHT  
**Sent:** Tuesday, January 28, 2020 1:37 PM  
**To:** secretary@puc.idaho.gov; diane.hanian@puc.idaho.gov  
**Subject:** Response to Idaho Power's Petition for Reconsideration of IPC-E-18-15 Final Order

Dear Secretary for the Idaho PUC,

I am attaching comments regarding Idaho Power's Petition for Reconsideration to the PUC's Final Order for IPC-E-18-15.

The Case Comment section of your website did not allow me to paste my comments in their entirety.

Sincerely,

Lisa Hecht



(208) 331-2159 office  
(208) 841-0058 mobile

## Diane Hanian

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**From:** PUC Consumer Comments <Do.Not.Reply@puc.idaho.gov>  
**Sent:** Tuesday, January 28, 2020 5:00 PM  
**To:** Diane Hanian  
**Subject:** Notice: A comment was submitted to PUCWeb

The following comment was submitted via PUCWeb:

Name: Bert Bowler  
Email: bertbowler@mac.com  
Telephone: 208-860-2829  
Address: 1990 S Stone Ridge Way  
Boise, ID 83712

Name of Utility Company: IPC

Case ID: IPC-E-18-15

Comment: "Thank you for listening to the public and your recent ruling on net metering. Please reject IPC's petition."

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**Diane Hanian**

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**From:** jd Powell <jamidawn.powell@gmail.com>  
**Sent:** Tuesday, January 28, 2020 1:06 PM  
**To:** Diane Hanian  
**Subject:** IPC-E-18-15

Dear Idaho Public Utility Commissioners,

I want to thank you for protecting my interests as a customer of Idaho Power by rejecting the settlement in case IPC-E-18-15.

I urge you to accept the petition for reconsideration filed by Vote Solar, and reject the Idaho Power Company petition for reconsideration filed on January 10th, 2020. Until the full study and cost-benefit analysis, including the public workshops you have ordered, are complete, all solar customers should be grandfathered into the current net metering policy. I believe the one-to-one compensation for excess generation from solar is fair, and future customers deserve the right to invest in the grid.

Thank you.

Jami-Dawn Powell

## Diane Hanian

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**From:** David Burica <buricad@gmail.com>  
**Sent:** Tuesday, January 28, 2020 6:02 AM  
**To:** Diane Hanian  
**Subject:** Comment for Case IPC-E-18-15

Hello, Diane,

Thank you for adding this comment to the record.

Case Number: IPC-E-18-15

Dave and Ingrid Burica

311 Heikkila Ln.

McCall, ID 83638

(208) 634-6478

[buricad@gmail.com](mailto:buricad@gmail.com)

Utility Company: Idaho Power

Dear Commissioners:

We wish to join all of the other commenters and thank you for your final order 34508 which addresses residential and small solar, grandfathering current systems.

We also wish to emphatically echo those who pointed out the need for interim clarity. By Idaho law, solar installers must make an informed estimate for the payoff for systems they propose to install, and they cannot do so without more guidance. To us, the simplest solution is to continue the current program with guarantees to the extent that are possible, and to do so in a fashion that protects installers. Not doing so opens “bad actor” installers to make false claims.

Finally, we especially want to thank you for clarifying your order and demanding a transparent, public, and comprehensive study of costs and benefits of this issue. We were actually quite stunned by the degree to which Idaho Power, in their Petition for Reconsideration of 10/20/2020, pushed back against your Final Order 34509. Their doubled down claim that the Settlement Agreement was “comprehensive”, when your Order showed quite clearly exactly why it was not, seemed disrespectful.

It is clear that Idaho Power wants to do all it can to avoid a truly comprehensive study. The IPUC Staff Answer correctly points out that the basis for Settlement Agreement was not a study at all, but “mix of workpapers and Company position statements.” We assume that the good folks at Idaho Power are not just natively stubborn or backward. Most likely they know well that a truly transparent comprehensive study of the facts will substantially change the calculations they used in the Settlement, both on the costs and on the benefits sides of the equation. They probably already know that the value of the export credit is nowhere near the number they ginned up, and we suspect they are desperate to avoid making that public.

Thank you for considering these comments and for your wisdom in this matter which has far-reaching implication for the future of electrical power production, distribution and usage in Idaho.

Sincerely,

## Diane Hanian

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**From:** PUC Consumer Comments <Do.Not.Reply@puc.idaho.gov>  
**Sent:** Tuesday, January 28, 2020 7:00 AM  
**To:** Diane Hanian  
**Subject:** Notice: A comment was submitted to PUCWeb

The following comments were submitted via PUCWeb:

Name: Julia Oxarango-Ingram  
Email: julia@juliasworld.org  
Telephone: 208-309-3090  
Address: 3811 W Kootenai St  
Boise, ID 83705

Name of Utility Company: Idaho Power

Case ID: IPC-E-18-15

Comment: "Reference case Number IPC-E-18-15 "Dear Idaho Public Utility Commissioners, I want to thank you for protecting my interests as a customer of Idaho Power by rejecting the settlement in case IPC-E-18-15. I urge you to accept the petition for reconsideration filed by Vote Solar, and reject the Idaho Power Company petition for reconsideration filed on January 10th, 2020. Until the full study and cost-benefit analysis, including the public workshops you have ordered, are complete, all solar customers should be grandfathered into the current net metering policy. I believe the one-to-one compensation for excess generation from solar is fair, and future customers deserve the right to invest in the grid. Thank you." "

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Name: Christopher Lind  
Email: boyseebench@yahoo.com  
Telephone: 208-771-1711  
Address: 9580 W Canyon Ridge Ln  
Boise, ID 83704

Name of Utility Company: Idaho Power

Case ID: IPC-E-18-01

Comment: "For 35 years I was a science teacher in Idaho. As you might guess I lived comfortably but not extravagantly. I long taught and believed that the conservation and responsible use of our natural resources for the benefit of mankind and our planet was everyone's responsibility. I saved to play a small part to decrease global CO2 emissions by installing solar panels on my home. When I had the panels installed, I had certain expectations of compensation by Idaho Power. First, I thank you for realizing it would unfair of Idaho Power to alter the one to one kilowatt hour credit compensation that I send to the grid. I thank you for rejecting the proposed settlement and recommending that Idaho Power begins a public process to design a comprehensive study of the costs and benefits to the grid of customer-owned solar. I believe it is only fair as the owners of customer owned solar were not given an adequate voice in Idaho Power's proposal. Please do not reopen Idaho Power's proposal."

## Diane Hanian

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**From:** Josh Powell <josh@revolusun.com>  
**Sent:** Tuesday, January 28, 2020 7:23 AM  
**To:** Diane Hanian; Diane Hanian  
**Subject:** Case Number: IPC-E-18-15

Dear PUC Commissioners-

As an Idaho Business Owner and an Idaho Power customer I want to thank you for protecting my interests as a customer of Idaho Power by rejecting the settlement in case IPC-E-18-15.

I urge you to accept the petition for reconsideration filed by Vote Solar, and reject the Idaho Power Company petition for reconsideration filed on January 10th, 2020.

Until the full study and cost-benefit analysis, including the public workshops you have ordered, are complete, all solar customers should be grandfathered into the current net metering policy.

I have been in the solar industry for over a decade. Prior to entering the solar industry I was a U.S. Naval officer and had the opportunity to work on renewable energy and resilience projects for the Department of Defense. The independence and resilience these systems offer the grid and our civil society is rarely factored into cost benefit analysis. Technology is moving quickly beyond traditional electrical grid infrastructure with many more consumer options than ever before - help make Idaho a leader in this space.

I believe the one-to-one compensation for excess generation from solar is fair, and future customers deserve the right to invest in the grid.

Thank you.

Joshua F. Powell, AIA  
Chief Executive Officer | RME  
Idaho - Hawaii - Massachusetts



2149 E. Summersweet Drive Boise, ID 83716  
208.315.4082 Office | 808.754.0571 Mobile

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## Diane Hanian

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**From:** PUC Consumer Comments <Do.Not.Reply@puc.idaho.gov>  
**Sent:** Tuesday, January 28, 2020 8:00 AM  
**To:** Diane Hanian  
**Subject:** Notice: A comment was submitted to PUCWeb

The following comment was submitted via PUCWeb:

Name: Josh Powell  
Email: josh@revolusun.com  
Telephone: 808-754-0571  
Address: 2149 E. Summersweet Drive  
Boise, ID 83716

Name of Utility Company: Idaho Power Company

Case ID: IPC-E-18-15

Comment: "Dear PUC Commissioners As an Idaho Business Owner and an Idaho Power customer I want to thank you for protecting my interests as a customer of Idaho Power by rejecting the settlement in subject case. I urge you to accept the petition for reconsideration filed by Vote Solar, and reject the Idaho Power Company petition for reconsideration filed on January 10th, 2020. Until the full study and cost-benefit analysis, including the public workshops you have ordered, are complete, all solar customers should be grandfathered into the current net metering policy. I have been in the solar industry for over a decade. Prior to entering the solar industry I was a U.S. Naval officer and worked on renewable energy and resilience projects for the Department of Defense. The resilience these systems offer the grid and our civil society is rarely factored into cost benefit analysis. The 1 to 1 compensation for excess generation from solar is fair, and future customers deserve the same."

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## Diane Hanian

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**From:** PUC Consumer Comments <Do.Not.Reply@puc.idaho.gov>  
**Sent:** Tuesday, January 28, 2020 10:00 AM  
**To:** Diane Hanian  
**Subject:** Notice: A comment was submitted to PUCWeb

The following comment was submitted via PUCWeb:

Name: Cecelia Osborn  
Email: ceceliaosborn@gmail.com  
Telephone: 208-727-7320  
Address: 13 Quigley Rd  
Hailey, ID 83333

Name of Utility Company: Idaho Power

Case ID: IPC-E-18-15

Comment: "The Commission listened to Idaho families and businesses and did the right thing by rejecting Idaho Power's proposed settlement to change its net-metering program. Now, the Commission must clarify and uphold their position. People to know regulatory certainty in order to make informed decisions about their investment and decision to lean into a growing industry that will bring billions in local investment and hundreds of thousands of jobs. Fair compensation for the electricity that solar owners produces is ultimately about freedom. It's the freedom to create your own electricity and choose where your energy comes from. Unfair compensaation programs designed by MONOPLY UTILITIES to maximise profits strip people of their freedom. They stand in between people and the local affordable clean energy that they want."

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