

Diane Hanian

From: Joshua Hill <joshuashill@alumni.brown.edu>
Sent: Monday, February 3, 2020 4:23 PM
To: Diane Hanian; Diane Hanian
Subject: Comment on Idaho Public Utility Commission case IPC-E-18-15 by Joshua Seth Hill

Comment on Idaho Public Utility Commission case IPC-E-18-15
by Joshua Seth Hill
joshuashill@gmail.com

Of all the things in my life, one of the things I am most grateful for is being born in America. The founding fathers of this country designed a system of government which provides citizens like myself the opportunity to be involved in the policies and ways by which we are governed. My hope in this writing is to express how the principles behind citizens owning solar power and the principles that helped found America align extremely well. In the second section of this document I will use quotes from our country's founders which might help influence you to support the actions I suggest herein. Finally, I want to make a conscious effort to be thankful for the opportunity to influence energy policy. I understand the sacrifices many have made not only to serve, but to give their lives for my freedom.

If brevity is more important than reading what I have written, I shall spare you the next few minutes and summarize this document now.

I would like to thank the commission for order #34509 in case IPC-E-18-15. The people voiced their desires and concerns, and the esteemed commissioners listened. The order has started the path toward designing a public utility with policies in the interest of the people.

I urge the commission to completely deny all aspects of the petition for reconsideration from Idaho Power in this case. The vast majority of their requests are based upon discriminatory policies, which the public has been assured would not be passed by our public utility Commissioners.

I would like to stress to the Commissioners that the previous settlement was little more than a political document, motivated largely by fear-based tactics. The research and facts I will be presenting will show this to be the case. Intervenors who signed onto the settlement strongly urged and even misled their constituencies to support this farce of new policy. The settlement terms were agreed upon, and further not objected to, out of pressure from various outlets to push what was in the best interest of THOSE outlets, not of the people. I would urge the commission to deny ALL requests for intervenor funding by parties signed onto the settlement, as funding the efforts of these organizations with rate payer dollars would further serve their participation in working against the best interests of the people.

In closing my summary, I wish to acknowledge the good people who supported the right side of this case. From the ethical industry professionals to the students and young people who have commented. I believe every Idahoan can see a bright future ahead for solar thanks to these people. I hope we all will soon realize that generating our power from rooftops is the most logical evolution for our grid. Further, that private ownership and the voice of the people must be valued above profit - lest we find our Nation faced with another Boston Tea Party.

Common sense solutions which do not discriminate are possible, and the easiest are presented below. Our current rate design must be fixed across all classes. Private investment in the grid needs encouragement. We should not punish those who have, or will, invest in our future and our freedom by choosing electricity which provides energy independence.

The above solution also prevents the discrimination proposed in the settlement by net hourly. Idaho Power argues in favor of a new net hourly policy claiming if for no other reason that it is more accurate than net monthly. Yet net hourly is clearly discriminatory unless it is used across all rate classes to determine the value of electricity across every hour, and charge or compensate accordingly. Hourly kWh value, if the desired policy, should be done for all customers. A net hourly policy would also be extremely burdensome to everyone, and the Commission seems to be aligned with our founder James Madison in this issue (quote to illustrate below). Again, the real problem is a Rate design issue, not a solar issue.

Further resolutions to on-site generation should be in the public's best interests. A simple subsidy of storage for customers is one example. If Idaho Power helped a customer buy storage, with mutual agreement from both parties that the grid could access say 50% of the capacity to curb peak demand, everyone wins. The buyer of the storage receives a reduced up-front cost, Idaho Power gains access to precious peak kWh's, and the end user of those kWh's would potentially pay a reduced rate long-term as the grid has more on-demand power with no increased expenditures needed for decades (at least one decade of warranted lifetime currently available with lithium based batteries, which are just one of many storage options).

I urge the commission to deny the current request for reconsideration by Idaho power. I would like to address a few of their key arguments in the reconsideration request...

In response to Idaho Power's claims of having done their diligence and completed an acceptable study, I defer to James Madison:

"It will be of little avail to the people that the laws are made by men of their own choice, if the laws be so voluminous that they cannot be read, or so incoherent that they cannot be understood; if they be repealed or revised before they are promulgated, or undergo such incessant changes that no man who knows what the law is today can guess what it will be tomorrow."

It was clear to the 1,000+ members of the public who commented on this case that the study was either not clear, not made known to them, nor did it involve them in any way. Further, the \$0 "placeholder" values for the benefits of solar should be a point of shame to all those who agreed to it in the settlement previously proposed in this case. I firmly attest that a \$0 valuation for Avoided T&D Capacity, Integration cost and environmental benefits should never have been proposed nor agreed to by any intervening party.

Having the case result in a full hearing seemed to be what all intervening parties were urged to avoid, and this is the central fear tactic used to get groups like the ICEA (Idaho Clean Energy Alliance) and others to support the settlement.

Other methods could have been used, but I personally attended a meeting in August of 2019 where fear of case IPC-E-18-15 going to a hearing was clearly conveyed to the solar industry present by ICEA leadership and council. The ICEA purported to represent the solar industry, and said as much at the meeting. Once the options to vote for or against the settlement were presented (without detail due to signed confidentiality agreements among intervening parties), it was strongly urged by the ICEA leadership that a settlement was best. The majority of the industry present did not agree. Other members of the industry had no idea of this meeting and were not informed of it taking place by the ICEA. This fact can be seen in comments and further proof can be provided as I reached out to as many industry members as possible after this meeting. Many were unaware of its existence.

ICEA leadership urged us to vote, and when it became apparent the vote was to reject the settlement, the vote was moved to email format. None of the industry I spoke with were told the outcome of this vote, and the ICEA ultimately signed onto the settlement anyway.

It could not have been more clear in the August meeting that the industry at large understood the detriment this settlement would have on their livelihoods, their future customers and their existing customers. The industry was not represented by the ICEA in support of the settlement. I urge the Commissioners to deny the ICEA

emphasize the importance of property rights and why grandfathering as a principle is just, and should be applied to a location rather than lose the status if ownership transfer occurs. I defer to John Adams to elaborate:

“The moment the idea is admitted into society, that property is not as sacred as the laws of God, and that there is not a force of law and public justice to protect it, anarchy and tyranny commence. If 'Thou shalt not covet,' and 'Thou shalt not steal,' were not commandments of Heaven, they must be made inviolable precepts in every society, before it can be civilized or made free.”

Next I would like to address Idaho Power's argument that the public was sufficiently notified in all matters related to this case. This argument is moot, primarily because the proof cited by commenters takes place after the intervenor entry period was closed. Idaho Power cites articles (by Ben Otto for example) and response letters from the public as evidence of notification, even pointing out their sending of letters to “2,637 current and 357 pending customers with on-site generation notifying them that Idaho Power had filed the case and inviting the to contact the Company for information about how to participate”. I would like to point out the fact that this letter SHOULD have gone out to all those impacted by this filing (again if we are to accept the cost shift argument as sound, all customers require notification), which is over 500,000 customers. I would like to stress that the timeline of their claims of evidence, as within just a few short months of this letter to less than 1% of their customer base, the opportunity to intervene was closed. Many if not all of their evidence showing the public writing in, are dated after the public could even become an intervening party. This is not how I would hope my government and utility should operate.

Even at this very moment of writing, I am rushing the formulation of my comments for fear of an unknown decision date by my public utility commissioners in this case. I have no idea when the comment opportunity will cease, and no chance to fully draft a proper comment.

Finally, as Idaho Power is a public utility with a guaranteed profit, it is only fair that customers who serve as part of the utility receive the same guaranteed profit. If a fair policy regarding generation of power is to be achieved, then the same profits should be received by any legal Idahoan who provides electricity. Transmission costs should be fair across all consumers, but profit for generation needs to be fairly distributed to all entities who pay for the electricity they generate. This is the only way we can adhere to the principles of America's constitution.

“Happy it is when the interest which the government has in the preservation of its own power, coincides with a proper distribution of the public burdens, and tends to guard the least wealthy part of the community from oppression!”

Alexander Hamilton, The Federalist Papers, No. 36, January 8, 1788

- Joshua Seth Hill

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Diane Hanian

From: PUC Consumer Comments <Do.Not.Reply@puc.idaho.gov>
Sent: Monday, February 3, 2020 11:00 AM
To: Diane Hanian
Subject: Notice: A comment was submitted to PUCWeb

The following comment was submitted via PUCWeb:

Name: David Makings
Email: drmakings67@gmail.com
Telephone: 298-428-4289
Address: 3405 N 3300 E
Kimberly, ID 83341

Name of Utility Company: Idaho Power

Case ID: IPC-E-18-15

Comment: "Regarding net metering. I agree with Idaho Power that it costs the company and therefore other customers a certain amount for Idaho Power to provide the hookup and other services and therefore 1 to 1 KWHr is not fair. However I suggest that Idaho Power develop a flat monthly fee for these services and that the electricity generated by the home owner be 1 to 1 "

[\[Open in the PUC Intranet application\]](#)

Diane Hanian

From: PUC Consumer Comments <Do.Not.Reply@puc.idaho.gov>
Sent: Saturday, February 1, 2020 12:00 PM
To: Diane Hanian
Subject: Notice: A comment was submitted to PUCWeb

The following comments were submitted via PUCWeb:

Name: Amelia Carter
Email: ameliajustin@yahoo.com
Telephone: 208-860-9266
Address: 4028 N Delmonte Dr.
Boise, ID 83704

Name of Utility Company: Idaho Power

Case ID: IPC-E-18-15

Comment: "Hello, I am writing to oppose Idaho Power's proposal to change it's solar net metering program. I am an Idaho Power user and considering adding solar panels to my home because I would like to supply my home with a cleaner power source and reduce my impact on the environment and climate change. The changes that Idaho Power have proposed seem unfair and will place a burden on future solar power users financially. I would like to ask that the Commission continue allowing future customers into the fair and simple one-for-one credit net-metering policy, until the public workshops and cost-benefit study are complete. Additionally, I would ask the PUC to deny Idaho Power's net hourly billing petition, as this would be discriminatory toward solar customers, and is neither necessary and nor justified without a comprehensive study. Finally, Idaho Power is a public utility, and they must complete the study that has been mandated multiple times in this case. Thank you for your time. "

Name: Risa Fowler
Email: sonrisa11@gmail.com
Telephone: 208-269-5448
Address: 460 Thistle Lane
Ketchum, ID 83340

Name of Utility Company: Idaho Power

Case ID: IPC-E-18-15

Comment: "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. We have a responsibility to move toward green resources for generations to come to have the climate and welfare we have experienced. Please continue to make progress toward maintaining natural balance in our world. Solar is clean energy. Thank you."

Diane Hanian

From: anne kalik <akalik@icloud.com>
Sent: Saturday, February 1, 2020 11:02 AM
To: Diane Hanian
Subject: Case Number IPC-E-18-15

Dear Secretary,
Please honor solar!
Please look forward to an earth that will sustain life.
Please act fairly in good conscience.

Sent from a device that garbles.
Anne Kalik

Diane Hanian

From: PUC Consumer Comments <Do.Not.Reply@puc.idaho.gov>
Sent: Saturday, February 1, 2020 7:00 AM
To: Diane Hanian
Subject: Notice: A comment was submitted to PUCWeb

The following comment was submitted via PUCWeb:

Name: Jody Stanislaw
Email: drjodystanislaw@gmail.com
Telephone: 208-309-3239
Address: PO Box 4423
Ketchum, ID 83340

Name of Utility Company: Idaho Power

Case ID: IPC-E-18-15

Comment: "Dear Idaho Public Utility Commissioners, 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, Dr. Jody Stanislaw"

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Diane Hanian

From: PUC Consumer Comments <Do.Not.Reply@puc.idaho.gov>
Sent: Friday, January 31, 2020 4:00 PM
To: Diane Hanian
Subject: Notice: A comment was submitted to PUCWeb

The following comments were submitted via PUCWeb:

Name: Theresa Williams
Email: boswellco@cox-internet.com
Telephone: 208-726-5640
Address: 202 Apache Dr
Hailey, ID 83333-8483

Name of Utility Company: Idaho Power

Case ID: IPC-E-18-15

Comment: "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"

Name: Ryan Redman
Email: ryanmredman@gmail.com
Telephone: 208-788-1407
Address: 210 W. Cottonwood St.
Hailey, ID 83333

Name of Utility Company: Idaho Power

Case ID: IPC-E-18-15

Comment: "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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Diane Hanian

From: Theresa Williams <boswellco@cox-internet.com>
Sent: Friday, January 31, 2020 3:44 PM
To: Diane Hanian
Subject: Case Number IPC-E-18-15

Dear Secretary,

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,

Theresa Williams

202 Apache Drive

Hailey, ID 83333

Diane Hanian

From: PUC Consumer Comments <Do.Not.Reply@puc.idaho.gov>
Sent: Saturday, February 1, 2020 2:00 PM
To: Diane Hanian
Subject: Notice: A comment was submitted to PUCWeb

The following comment was submitted via PUCWeb:

Name: Michelle Evans
Email: michelleevans299@gmail.com
Telephone: 208-866-6648
Address: 6400 S Santa Cruz Dr
Boise, ID 83709-6549

Name of Utility Company: Ms.

Case ID: IPC-E-18-15

Comment: "I believe it should be easier not harder, for Solar Energy. It's time has come and it would be good if public utilities worked with Solar Energy instead of against it. The dams will eventually be breached for the good of all so Idaho Power would be wise to quit trying to reverse the decision that it's already made by the PUC and stop trying to make the solar energy be billed hourly which will make it much less affordable and therefore much less available to everyone. Let the decision stand! You ask for this study and decision so go with it! Let what is for the greater good guide you instead of greed. "

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Diane Hanian

From: PUC Consumer Comments <Do.Not.Reply@puc.idaho.gov>
Sent: Saturday, February 1, 2020 3:00 PM
To: Diane Hanian
Subject: Notice: A comment was submitted to PUCWeb

The following comment was submitted via PUCWeb:

Name: Terry Maret
Email: TERRYMARET@GMAIL.COM
Telephone: 208-362-9027
Address: 4083 Argonaut Ave
Boise, ID 83709

Name of Utility Company: Mr.

Case ID: IPC-E-18-15

Comment: "Question. We are existing solar produces since 2017. Does the IPUC decision to grandfathered us also include new owners that may buy our home in the future? Our decision to invest \$30,000 in solar included an anticipated increase in home value to offset this expense. Terry Maret Boise"

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Diane Hanian

From: PUC Consumer Comments <Do.Not.Reply@puc.idaho.gov>
Sent: Sunday, February 2, 2020 7:00 AM
To: Diane Hanian
Subject: Notice: A comment was submitted to PUCWeb

The following comment was submitted via PUCWeb:

Name: Elaine Fisher
Email: fisher.ek17@gmail.com
Telephone: 208-283-4863
Address: 3515 Garrity Blvd
Nampa, ID 83687

Name of Utility Company: Ms.

Case ID: IPC-E-18-15

Comment: " Please continue allowing future customers into the fair and simple one-for-one credit net-metering policy, until the public workshops and cost-benefit study are complete. Please continue denial of Idaho Power's net hourly billing petition."

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Diane Hanian

From: PUC Consumer Comments <Do.Not.Reply@puc.idaho.gov>
Sent: Sunday, February 2, 2020 11:00 AM
To: Diane Hanian
Subject: Notice: A comment was submitted to PUCWeb

The following comment was submitted via PUCWeb:

Name: Brian O'Neill
Email: boneill3771@yahoo.com
Telephone: 208-891-6733
Address: 6000 N Glenwood
Garden City, ID 83714

Name of Utility Company: Idaho Power

Case ID: IPC-E-18-15

Comment: "Should using sustainable energy be penalized or acknowledged as environmentally and economically good decisions? I feel that Idaho Power is upset that money is not going into their pocket but instead it is being invested in another for renewable energy. This is another case of Greed from Big Business which happens more and more. There shouldn't be a penalty or yet another tax that conscious citizens have to pay. "

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Diane Hanian

From: PUC Consumer Comments <Do.Not.Reply@puc.idaho.gov>
Sent: Sunday, February 2, 2020 3:00 PM
To: Diane Hanian
Subject: Notice: A comment was submitted to PUCWeb

The following comment was submitted via PUCWeb:

Name: Margaret Gallagher
Email: skuabird@yahoo.com
Telephone: 678-468-4674
Address: 2716 W. Madison Ave
Boise, ID 83702

Name of Utility Company: Idaho Power

Case ID: IPC-E-18-15

Comment: "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 again 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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Diane Hanian

From: PUC Consumer Comments <Do.Not.Reply@puc.idaho.gov>
Sent: Monday, February 3, 2020 7:00 AM
To: Diane Hanian
Subject: Notice: A comment was submitted to PUCWeb

The following comments were submitted via PUCWeb:

Name: Effie Schultsmeier
Email: effie2880@yahoo.com
Telephone: 208-888-5934
Address: 2880 W Kuna Mora Rd
Kuna, ID 83634

Name of Utility Company: Idaho Power Company

Case ID: IPC-E-18-15

Comment: "I request that you deny Idaho Power's net hourly billing petition. This petition is discriminatory toward solar customers and it is neither necessary nor justified without a comprehensive study. I believe it is important that the Commission continue allowing future customers into the fair and simple one-for-one credit net-metering policy. I am frustrated by Idaho Power's continuing efforts to penalize solar customers when we are saving the company considerable money by providing electricity into the grid during times of high energy use (daytime). This lessens the need for Idaho Power to seek new sources of electricity and the high cost of both building new facilities and new transmission lines."

Name: Carol Johnston
Email: moosecarol63@gmail.com
Telephone: 208-703-7408
Address: 10100 W. Clarkson Pl.
Boise, ID 83704

Name of Utility Company: Idaho Power

Case ID: IPC-E-18-15

Comment: "I request that you deny Idaho Power's net hourly billing petition, as it would be discriminatory toward solar customers, and is neither necessary and nor justified without a comprehensive study. Please do all you can to make--and keep--solar power affordable. We need to transition to renewable power sources as soon as we can. "

[\[Open in the PUC Intranet application\]](#)

Diane Hanian

From: westmorjw@aol.com
Sent: Friday, January 31, 2020 2:30 PM
To: Diane Hanian
Subject: Fwd: Solar Power

From: westmorjw@aol.com
To: Diane.hanian@puc.idaho.gov, secretary@puc.idaho
Sent: 1/31/2020 2:27:34 PM Mountain Standard Time
Subject: Solar Power

Dear Idaho Public Utility Commissioners,

We have installed solar voltaic and solar thermal panels in our home. They were installed four or five years ago, based in part on the promise by Idaho Power for net metering.

I want to thank you for protecting our 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.

Julie Weston
105 Hopi Dr
Hailey, ID 83333
208-788-7085

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

RECEIVED
2020 JAN 31 AM 9:59
IDAHO PUBLIC
UTILITIES COMMISSION

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 10th, 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 2/3rd of its cost of delivering electricity, is not accounted for. This is potentially a large number!

(given a zero value).

- 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

January 27, 2019

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

Subject: Case Number IPC-E-18-15

Dear Commissioners:

I am a customer of Idaho Power and owner of an on-site solar power generation system.

It seems that Idaho Power has made up its mind about costs that should be borne by on-site generators, but the IPUC (based on the December 20, 2019 order), on-site generators and solar installers are not convinced. Idaho Power doesn't provide a justification for their position because they don't have the data. I urge you not to approve the Settlement Agreement.

Idaho Power claims to have completed a comprehensive study. They have not. They left out costs and benefits that could be in favor of on-site generators. Also, I don't believe that IPUC's request for the study would force Idaho Power to discard thousands of hours of work put into the documents cited in the settlement agreement. The request is for additional work to study the elements left out of the original analysis.

Additionally, Idaho Power asks the IPUC to ease requirement for the public process. I totally disagree with this request. The IPUC provided well thought out requirements for Idaho Power to move forward with public education and process. I think this is a great approach that helps the public better understand a complex situation, and the IPUC should be congratulated on responding the public's concerns.

Finally, I support the proposal to going to hourly metering now with no change to compensation value. This would provide valuable information for Idaho Power, on-site generators, and solar installers. Gathering information and performing studies that are available and understandable to the public makes for better and fairer decisions.

Thank you for your consideration.

Sincerely,

Rob Hanson
2061 E Feldspar Ct.
Boise, Idaho 83712
208-383-0349
robeerun@aol.com

RECEIVED

2020 JAN 31 AM 10:00

IDAHO PUBLIC
UTILITIES COMMISSION

RECEIVED

2020 FEB -3 AM 10:40

IDAHO PUBLIC
UTILITIES COMMISSION

January 30, 2020

Idaho Public Utilities and Staff
P.O. Box 83720
Boise, Id. 83720-0074

RE: Case Number IPC-E-18-15, Staff response

Dear Members,

Thank you so much for your well reasoned and clearly expressed response to Idaho Power's request for reconsideration of your December decision and recommendations. I'm glad that you refuted their claim that they had a "robust" public notification process as I received only one notification prior to the October 2019 announcement of a settlement of a new rate structure. Also, I appreciate that you recognize that they had not completed a study of the "true cost" to Idaho Power of residential solar energy production. Instead they had a discussion/compromise with "parties" of the method they might use to calculate the cost.

Thank you for the clarification of "grandfathering" being for the system, not the owner and for clarifying the process of moving to phase III proposal for program changes.

With both the city of Boise and Idaho power pledging to be carbon neutral in the future, I look forward to participating in this next phase. I hope a solution will involve incentivizing Idaho Power and the State to promote residential solar energy production with "fair" compensation to Idaho Power to support their infrastructure costs.

Thank you again for all your time and effort,



Gregory Farmer (owner of a residential solar system)
568 Victoria Dr.
Boise, Id. 83705