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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION OF)	
IDAHO POWER COMPANY TO STUDY THE)	CASE NO. IPC-E-18-15
COSTS, BENEFITS, AND COMPENSATION OF)	
NET EXCESS ENERGY SUPPLIED BY)	STAFF'S ANSWER TO
CUSTOMER ON-SITE GENERATION)	PETITIONS FOR
)	RECONSIDERATION
)	

BACKGROUND

On May 9, 2018, in Docket No. IPC-E-17-13, the Commission ordered Idaho Power Company ("Idaho Power" or "Company") to "initiate a docket to comprehensively study the costs and benefits of on-site generation on Idaho Power's system, as well as proper rates and rate design, transitional rates, and related issues of compensation for net excess energy provided as a resource to the Company." Order No. 34046 at 31. The Commission encouraged the parties to work through these issues together in compromise. *Id.* at 22.

On October 19, 2018, Idaho Power petitioned the Commission to open this docket to effectuate the Commission's directive in Order No. 34046.

On December 20, 2019, the Commission rejected a proposed Settlement Agreement in this case. Order No. 34509.

On January 8, 2020, a petition for reconsideration was filed by students from Boise High School and Boise State University. These students requested the Commission allow grandfathering of existing customers until the Commission approves program changes.

On January 9, 2020, a petition for reconsideration was filed by Richard Kluckhohn. Mr. Kluckhohn requested the Commission “grandfather the system, for the life of the system or a reasonable time frame of not less than the standard warranty period of the system, as opposed to grandfathering the customer.” Richard Kluckhohn’s request for reconsideration of Order No. 34509 at 5.

On January 10, 2020, Thomas Baskin filed a petition for reconsideration/clarification requesting the Commission clarify whether an expansion of his current system after December 20, 2019, would result in the loss of grandfathered status for his entire system, or whether only the new panels would not be grandfathered.

On January 10, 2020, Idaho Conservation League and Vote Solar filed a petition for reconsideration requesting the Commission reconsider its decision to grandfather customers as of the date of Order No. 34509, and instead grandfather customers as of the date the Commission approves a successor program.

On January 10, 2020, Idaho Clean Energy Association filed a petition for reconsideration requesting the Commission allow customers to continue to sign up under Schedules 6 and 8 until the Commission approves program changes in the future, in order to allow solar installers to provide accurate estimates to potential customers.

On January 10, 2020, Micah Hornback filed a petition for reconsideration requesting the Commission allow customers who sign up until the new net metering policy has been finalized and approved to receive grandfathered status.

In this answer to petitions for reconsideration, Staff responds to Idaho Power’s petition for reconsideration, Idaho Clean Energy Association’s petition for reconsideration, Idaho Conservation League and Vote Solar’s petition for reconsideration, and Thomas Baskin’s petition for reconsideration.

STAFF ANALYSIS

I. Staff Disagrees with the Company’s Characterization of the Documents in the Record and Does Not Believe the Documents Meet the Standard Clarified by the Commission in Order No. 34509.

Staff understood the Commission’s directive in Order No. 34046 as directing the parties to study the issues and work together collaboratively in compromise. To this end, Staff and the

parties studied the data provided by the Company and proposed alternative methods of calculation for different issues, such as how to calculate the energy and capacity values of distributed net-metered systems. The parties also worked together to determine other important elements of program design, such as the move to net hourly billing, the inclusion of a non-export option, a transition period, parameters for the use of smart inverters, and determining how payments of the Export Credit Rate would be recovered by the Company. This was a comprehensive data-driven collaborative study, however, the action of studying these issues did not result in the physical product of a study; it resulted in a Settlement Agreement.

The Commission clarified its directive from Order No. 34046 in Order No. 34509, and clearly stated that it expected a comprehensive study to be produced by the parties. Having read Order No. 34509, Staff understands the importance of a comprehensive study by which the Commission can evaluate any future program change proposals, and supports the process laid out by the Commission to ensure that the study is credible and fair.

Staff disagrees with the Company's characterization of the documents in the record. The "Initial Study" referred to by the Company is a mix of workpapers and Company position statements. The Company did analyze the data and put forward a strawman proposal, as the Company describes, which was included in Attachment 4 to the Motion to Approve Settlement Agreement. Attachment 4 to the Motion to Approve Settlement Agreement is labeled "WORKPAPERS (PROVIDED ON CD)." The Motion to Approve Settlement Agreement, which was jointly submitted by Staff and the Company, referred to this information as applying to Commission Rule of Procedure 121, which prescribes the form and contents of an application to change rates, to the extent that rule was applicable to the Company's Application. The Commission acknowledged this information was in the record in Order No. 34509 and correctly assessed, "These files appear to be the starting point of negotiations between the parties and not the comprehensive study ordered by the Commission. Though this information is in the decision-making record, the manner in which it is presented and the lack of context prohibit the Commission, or the public, from evaluating it in any meaningful manner." Order No. 34509 at 8-9.

The Company states it submitted the Final Export Credit Rate Study with its Comments in Support of Settlement Agreement submitted to the Commission on November 6, 2019. Petition at 17. This is the first Staff has heard of there being a final study conducted in this

docket, and disagrees with the Company's characterization of these documents as a study. These documents describe the methodology agreed to by the parties in the Settlement Agreement to calculate the value of exported energy and the capacity value of distributed generation. Staff believes a valid study would include a discussion of alternatives considered and greater explanation for why the method selected performs better than the other alternatives, as well as what metrics are used to determine what better performance means. Additionally, even if these documents could be accurately characterized as a study, they are by no means a comprehensive study of the Company's net metering program. The Commission made it clear in Order No. 34509 that it expected a comprehensive study to be conducted and filed with the Commission in order to evaluate any future proposals to change the net metering program design. The Company's belated characterization of these documents as a final study, even if accepted, would not meet the Commission's standard of a comprehensive study.

II. The Company's Claim it Engaged in a Robust Public Notification Process is False.

The Company asks the Commission to find on reconsideration that the public was on adequate notice that significant net-metering program changes would result from IPC-E-18-15, and not simply a study of the issues. Additionally, the Company goes on to assert that grandfathering existing customers effectively mooted the notice issue because existing customers will continue to qualify for the program they signed up for, and new customers are on notice that program fundamentals are likely to change. Staff disagrees with both claims.

The Company states that it "engaged in a robust public notification process, providing ample notice to the public that this docket could result in alterations to the net metering service." Idaho Power's Petition for Reconsideration at 23. The Company then states that Attachment 2 to its petition for reconsideration and/or clarification "contains a long list of such communications to the public by the Company, Staff, the Commission, and others." *Id.* The only documents in Attachment 2 issued by the Company are a letter to then-existing Schedule 6 and Schedule 8 customers, and a letter to solar installers. Both letters state, "Our Oct. 19 filing begins the next phase of collaboratively studying the benefits, costs, rate design and proper compensation structure for on-site generation customers, as directed by the IPUC." *Id.* Att.2 at 4, 5. Both letters reference "working toward a solution." The letters did not include a case number, direction to case documents on the Commission's website, the Commission's contact

information, or direction to the Commission's customer comment form. The Company's single attempt at notifying customers did not clearly indicate that rates might change as a result of this docket.

Staff also notes that this letter only went to the active and pending 2,994 Schedule 6 and Schedule 8 customers, and therefore excluded all prospective net-metering customers and all other customers who might have been interested in the issue. The Company has substantial means to reach its customers including social media, email, bill stuffers, its monthly newsletter, local television, radio, billboards, bus stop benches, the sides of buses, and other means. Staff does not agree that letters sent to existing net-metering customers and solar installers with references of a study supports the Company's claim that it "engaged in a robust public notification process."

For further support of its claim that the public was on adequate notice that fundamental changes to the Company's net-metering program were forthcoming, the Company points to 81 public comments received by the Commission regarding the case in the year between the Company filing its Application and the filing of the Settlement Agreement. The Company states this demonstrates "the public not just heard but *understood* such changes were possible." Idaho Power Petition for Reconsideration at 23 (emphasis in original). By the Company's count, approximately 75% of commenters made statements regarding possible program changes that might result from the docket. *Id.* Thus the Company is relying on statements from approximately .01% of all residential customers to support its statement that the public was adequately aware that changes to the net-metering program were being considered.

Notably, the Company does not refer to the hundreds of customers who testified they did not know this case existed, or did not realize that it would result in program changes, until they received the Company's letter notifying them of the Settlement Agreement in late October 2019. A handful of customers testified that they knew the case existed and were actively seeking information about it and its possible impacts, but no meaningful information about the discussions or opportunity to directly engage existed because the settlement negotiations were confidential.

The Company goes on to claim that grandfathering existing customers effectively moots the opposition to the Settlement Agreement raised in public comments. Staff believes the Company's claim inappropriately assumes that incorporating public feedback into the design and

review of a comprehensive study would not change the results of the study. Staff also believes the Company's statement is a mischaracterization of the public testimony because customers consistently stated that not only did they want to be grandfathered, but the Commission should reject the Settlement Agreement because the public was under the impression a study was being conducted. Staff strongly supports the Commission's directive to engage the public in the design and review of a comprehensive study that will be the basis of future proposals to change the Company's net metering program.

III. Staff Strongly Disagrees with the Company's Proposed Process Going Forward.

The Company asks the Commission to reconsider the process it prescribed to gain public input and conduct a credible and fair study. "Idaho Power respectfully requests . . . the Commission reconsider the extensive procedures it has prescribed for conducting an entirely new comprehensive study from scratch." Petition at 26. The Company states that the procedure prescribed by the Commission will send the parties back to the drawing board and discard thousands of hours of analysis. *Id.* In place of conducting a credible and fair comprehensive study with extensive public input, the Company seeks immediate implementation of net hourly billing and a bifurcated study only on the method to calculate the exported value of energy. This proposed process disregards the role of public input and would implement a key element of net metering program design without the benefit of a comprehensive study, contrary to the Commission's expressed concerns in Order No. 34509.

Staff believes the Company's recommendation to implement net hourly billing before the conclusion of the study ordered by the Commission inappropriately presupposes the outcome of the study. It appears as though the Company believes the outcome of the study will not be changed by public input and additional study by the parties. Staff does not believe the Commission ordered the public process as a mere formality to be checked off the list prior to approval of a predetermined net metering program. Staff believes the process ordered by the Commission is designed to provide more robust analysis, input from a wider spectrum of perspectives, and result in a program design that more fairly balances the interests of the Company and its customers. Additionally, the move to net hourly billing from net monthly billing was perhaps the single most significant program change affecting the economic value of

distributed generation systems to net-metering customers in the Settlement Agreement and therefore should not be made in isolation without full consideration.

Furthermore, Staff does not believe the Company's proposal would streamline the process because additional justification for the change to net hourly billing would be necessary, which would require additional process on one isolated part of the net metering program. The Commission already stated the record does not support approval of the Settlement Agreement, so it is not clear how the record could support approval of one aspect of the Settlement Agreement that has less evidentiary support than other aspects of the Settlement Agreement, without substantial further process.

The information on the record the Company points to in support of the Settlement Agreement, which it has retroactively labeled a Final Export Credit Rate Study, describes the methodology the parties agreed to use to value exported energy and capacity from distributed net-metering systems. Yet under the Company's proposal for a streamlined process, only the value of exported energy and capacity would be subject to the public process outlined by the Commission in Order No. 34509. This makes no logical sense. The aspect of the Settlement Agreement with the most evidentiary support is the valuation of exported energy. The only aspect of the process going forward the Company wants to continue to study is the valuation of exported energy. There is a disconnect between the Company's statements that there is sufficient evidence on the record to approve the Settlement Agreement and the Company's offer to continue to study the value of exported energy going forward.

Staff believes the parties would not be starting from scratch under the proposed process articulated by the Commission in Order No. 34509. Through the last year of study and settlement negotiations, the parties have gained a deeper understanding of the issues, and more knowledge about the elements of net metering program design. This knowledge and experience will not be lost and will be very useful in the next phase of net metering program study. Staff believes the parties can build on the work done, share their knowledge and experience with the public, receive valuable feedback and input from the public, and continue to refine and hone policy proposals. Having read Order No. 34509, Staff views the process initiated in Order No. 34046 and refined in Order No. 34509 as an iterative process that entails phases of study, review, incorporation of feedback, and potential redesign until the interests of the Company and its customers are balanced fairly. Staff sees the IPC-E-18-15 docket as Phase I of the collaborative

process. Staff sees the process laid out in Order No. 34509 as Phase II of the collaborative process. When the Commission determines a credible and fair study has been completed that is adequately comprehensive, then the parties will move to Phase III, which Staff anticipates will be proposals for program change.

Staff believes the Settlement Agreement provides an excellent point of reference for future study. Staff believes the Settlement Agreement can be used as a well-honed strawman proposal of what one program design could look like. The Company, the parties, and interested net-metering customers can track what implementation of the Settlement Agreement would have done and compare it to the continued effects of Schedule 6 and Schedule 8 as they still exist. This will provide a valuable point of reference for future study and consideration, and should relieve some of the Company's consternation about starting from square one.

The Commission should reject the Company's proposed process, and adhere to the process the Commission laid out in Order No. 34509.

IV. Interim Customers Do Face Some Uncertainty from the Commission's Order.

The Company, Idaho Conservation League and Vote Solar, and the Idaho Clean Energy Association, as well as other petitioners, made proposals regarding the treatment of interim customers, and noted the level of uncertainty faced by prospective net-metering customers. Any customer who was considering installing a net-metering system, but did not make a binding financial commitment do so on or before December 20, 2019, must now make an investment decision knowing that the net-metering program structure is likely to change, but with no insight into how the program structure is likely to change. Additionally, the Residential Solar Energy Disclosure Act ("RSEDA") requires solar retailers to provide potential customers with written estimates of the "estimated projected savings over the life of the solar agreement and the estimated projected savings over any longer period not to exceed the anticipated useful life of the system. . ." *Idaho Code* § 48-1805(2). However, if the solar retailer does not have the information required to be disclosed in the RSEDA, the solar retailer "may make a good faith estimate of that information in the disclosure statement if the solar retailer clearly indicates that the information is an estimate and provides the basis for the estimate." *Idaho Code* § 48-1808. Staff believes that Order No. 34509 and the RSEDA can be harmonized, and solar retailers can make informed good faith estimates. Nevertheless, Staff acknowledges that the uncertainty may

unintentionally create more room for unscrupulous actors to proffer misguided estimates, while making it more difficult for scrupulous actors to provide accurate estimates.

The Idaho Conservation League and Idaho Clean Energy Association, among others, asked the Commission to allow customers to be grandfathered until such time as the Commission implements program changes. If the Commission would like to reduce uncertainty during the interim, a statement from the Commission that it will apply future program changes prospectively, to new customers only, would resolve much of the uncertainty complained of by the parties.

As previously stated, Staff believes the Company's proposal to immediately implement net hourly billing is ill-conceived and not supported by information on the record. But, in line with the Commission's directive to incorporate public feedback, one option to address the uncertainty expressed by petitioners could be for the Commission to state that interim customers (those customers who make a binding financial commitment to install a net-metering system after December 20, 2019, and before the next programmatic changes are authorized or implemented) would be eligible to receive net monthly billing for the warrantied life of their system. This differs from the Company's proposal to immediately implement net hourly billing because net monthly billing is the status quo, and would not be a program change. Solar retailers and potential net-metering customers have easy access to monthly billing data, and familiarity with the characteristics of net monthly metering. Other aspects of the program, such as the value for excess energy, would be subject to change when the Commission implements an updated net metering program. This could result in a fair balance between some certainty for prospective customers upon which they can make a large financial investment, and would prevent an overwhelming surge of customers signing up for net-metering in the interim period. Additionally, this could undercut the ability of unscrupulous solar retailers from presenting overly optimistic potential returns that would never be realized while allowing solar retailers operating in good faith to make reasonable forecasts.

V. Clarification or Reconsideration on Grandfathering may be Appropriate.

In its petition, the Company requests clarification on the specifics of grandfathering in order to prevent unforeseeable or unstoppable life events from eliminating the grandfathered status of a customer. Staff believes that grandfathering the system, as opposed to the customer,

would remove many of the uncertainties identified by the Company. The Company, in a cross-petition, stated it does not oppose grandfathering by system location for 25 years rather than by customer indefinitely, and that this would be consistent with the practice in other states. Idaho Power Company's Answer/Cross-Petition to Richard Kluckhohn's Request for Reconsideration at 5. Additionally, to address the issues raised in the petition for clarification or reconsideration submitted by Thomas Baskin, the Commission could reconsider whether to allow expansion of grandfathered systems within certain parameters, or clarify the extent to which the Commission allows repair and replacement of system components.

In the alternative to grandfathering the system to relieve future confusion and complaints, the Commission could clarify exemptions to losing grandfathered status based on difficult life events. The loss of grandfathered status due to unforeseen or unavoidable life events would create situations of unfairness and would likely result in numerous complaints to the Commission throughout the years. Staff agrees that in the case of the death of a spouse, the surviving spouse should be able to continue to receive the grandfathered status, regardless of which spouse's name was on the bill. Staff also believes this logic should extend to unmarried couples living together, regardless of which partner's name was on the bill. Staff also believes it should extend to incidents of mental or physical incapacity, in addition to death. These are but a few examples of the difficulty of administering grandfathered status by customer, and Staff notes that these difficulties would arise for a customer during precarious, uncertain, and trying times in their lives when the customers have more pressing concerns to deal with. Staff believes it may be possible to include language that provides for possible exceptions based on situations that are unduly unfair, but trying to predict all possible exceptions to the rule seems difficult at best, and would still require case by case determination well into the future.

Staff disagrees with the Company's assertion that Order No. 34509 provides notice to all customer classes that the compensation structure may change. This docket deals specifically with Schedule 6 and Schedule 8, which are for residential and small general service net-metering customers respectively. The Company filed IPC-E-17-13 to separate these customer classes from Schedule 84, which prior to Order No. 34046, contained all net-metering customer classes. Because this case pertains only to residential and small general service customers, Staff believes Order No. 34509 should only apply to these customer classes. Additionally, the Company cites to the Commission's justification in Order No. 34509 to grandfather customers, which includes

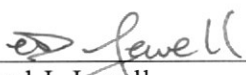
reference to the RSEDA. It is worth pointing out that this Act dictates disclosure requirements for residential customers. The Act defines a “consumer” as “a person who, for primarily personal, family, or household purposes . . .[p]urchases a residential solar energy system . . .” (emphasis added). *Idaho Code* § 48-1802(1). Thus, neither the Commission’s Order, nor the RSEDA provides notice to customers outside of Schedules 1, 6, 7, or 8 (residential and small general service schedules).

The Company also asks for clarification that grandfathered customers in Schedule 6 and 8 will be subject to rate structures and consumption rates that may be implemented after a “future rate proceeding.” Staff notes that the language in the order explicitly states that proposals for these changes should “be made only in a general rate case,” which does not necessarily align with the Company’s more vague description of qualifying dockets as a “future rate proceeding.”

VI. Impacts on IPC-E-19-15: Application to Study Measurement Interval for On-Site Generation Under Schedule 84

Staff recommends the Commission direct the Company to withdraw its Application in IPC-E-19-15. That case was conducted in a manner almost identical to IPC-E-18-15, which the Commission found to not sufficiently include public participation and required the completion of a credible and fair comprehensive study. Staff believes it would be reasonable for the Commission to direct parties in IPC-E-19-15 to prepare a comprehensive study using the same procedures and the same criteria established by Order No. 34509 for residential and small general service customers.

Respectfully submitted this 17th day of January 2020.



Edward J. Jewell
Deputy Attorney General

Umisc/Comments/ipce18.15ej reconsideration response

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 17TH DAY OF JANUARY 2020, SERVED THE FOREGOING **STAFF'S ANSWER TO PETITIONS FOR RECONSIDERATION**, IN CASE NO. IPC-E-18-15, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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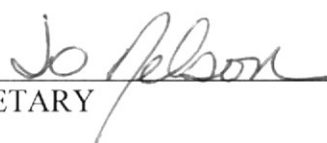
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