

From: [PUC Consumer Comments](#)
To: [Jan Noriyuki](#)
Subject: Notice: A comment was submitted to PUCWeb
Date: Saturday, October 10, 2020 7:00:08 AM

The following comment was submitted via PUCWeb:

Name: Randy Anderson
Submission Time: Oct 9 2020 8:40PM
Email: hghbasin@gmail.com
Telephone: 208-390-8199
Address: 119 Westello
Pocatello, ID 83204

Name of Utility Company: Idaho Power

Case ID: IPC-E-20-26

Comment: "Please do not allow Idaho Power to restrict future solar installers from net metering advantages. Also, please extend the comment period for commercial and at companies to no more than 100kw limit on net metering. As this is harvest time, many farmers do not have time to respond. With all the effects of climate change Idaho Power should put the needs of our country ahead of it's own drive for more profits. Lastly Idaho Power needs to accurately evaluate and compensate private solar installers for the value we contribute to Idaho's energy independence. Thank you, Randy Anderson"

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From: [PUC Consumer Comments](#)
To: [Jan Noriyuki](#)
Subject: Notice: A comment was submitted to PUCWeb
Date: Monday, October 12, 2020 7:00:05 AM

The following comment was submitted via PUCWeb:

Name: Lindsay Meloy
Submission Time: Oct 11 2020 10:43PM
Email: Lindsaymeloy@gmail.com
Telephone: 208-340-0834
Address: 1507 E Wright St
Boise, ID 83706

Name of Utility Company: Idaho Power

Case ID: IPC-E-20-26

Comment: "There are SO many reasons that removing the dual-meter requirement for new solar systems on farms is unfair. Idaho Power has proven time and time again that they have only their best interests at heart, so I implore the PUC to act as the voice of the people since we can not vote by switching away from the Idaho Power monopoly. Power costs are among the most expensive inputs to farms with irrigation pumps. In order to control this and be more self reliant - something extremely important to Idahoans - many farmers choose to install solar under Idaho Power's current net metering program. However, now Idaho power wants to change part of that program (the dual-meter requirement) without establishing new and fair export rates. This proposal lays the foundation for lowering the net metering credit rate, which would have a big impact on the investments of current and future solar owners. Idaho Power claims that solar is growing too fast even though they know that irrigators would add about 16 MW of solar to a system that can handle more than 3600 - that's .4%!! This means that individual solar systems are important for individual farmers, but have no meaningful impact on Idaho Power's total system. Net metering is for individuals who want to invest their own money in their own farm. I am asking you to protect a farmer's right to control their own power bills with home-grown energy. I am also asking you to extend the public comment period beyond the fall harvest season, when farmers can more meaningfully engage in the process. This stands for itself. To have a process meant to give those who will be affected a voice, but then run that process during a time when they can't use that voice is simply unfair. Add to that the fact that Idaho power isn't even prepared because they don't have an alternative plan, and waiting makes the most sense. Idaho Power has already shown that they do not want to appropriately value exported power. We saw that when they tried to change residential net metering and were told they actually had to bring facts to the table first. Please ensure Idaho Power maintains fair export credit rates and accurately values the extra power customer-solar provides using independent data. Additionally, I ask the PUC to give farmers the freedom to invest in a solar system that's large enough to meet their energy needs. The arbitrary 100 kilowatt cap means a business or farmer cannot offset all of their own needs and must then buy from Idaho"

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From: [PUC Consumer Comments](#)
To: [Jan Noriyuki](#)
Subject: Notice: A comment was submitted to PUCWeb
Date: Monday, October 12, 2020 9:00:06 AM

The following comment was submitted via PUCWeb:

Name: Laurie Zuckerman
Submission Time: Oct 12 2020 8:52AM
Email: laurie.noletzuckerman@gmail.com
Telephone: 208-631-1890
Address: 3909 W Camas St
Boise, ID 83705

Name of Utility Company: Idaho Power

Case ID: IPC-E-20-26

Comment: "Please extend the 12/1/2020 cutoff date for the solar net metering program until Idaho Power and Idaho farmers have agreed to a plan that allows Idaho farmers, ranchers and commercial customers to generate their own energy. Our agriculture sector is the second largest industry in the state and needs this energy option to thrive. Idaho Power can remain profitable even if we diversify our grid. In fact, by diversifying the grid, we not only promote agriculture, we promote our state security. It is not safe to rely on a single company for energy."

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From: [Wendy Hosman <wendyhosman@cox.net>](mailto:wendyhosman@cox.net)
To: [Jan Noriyuki](#)
Subject: Comment re: Idaho Power's 2020 Electric IRP, Case No. IPC-E-19-19
Date: Monday, October 12, 2020 3:35:23 PM

Dear Idaho Public Utilities Commission:

I am an Idaho Power customer and I support the clean energy commitments that Idaho' Power has made, but would like you to shorten the timeline and reach these goals sooner. Clean energy can grow Idaho's economy, support energy independence, protect our air quality, and help combat climate change. I am concerned about climate change and want to reduce our use of fossil fuels like coal and gas. Idaho Power should not waste money on gas and instead invest in local Idaho resources.

Regards,
Wendy Hosman
491 Maple Ridge Loop
Bellevue, ID 83313

I acknowledge that submitting a comment in an open case constitutes a public record under Idaho Code § 74-101 (13) and all information provided by me on this form is available for public and media inspection. My comment may be reviewed by the utility.

From: Adam Young <adambrentyoung@gmail.com>
Sent: Tuesday, October 13, 2020 10:32 AM
To: Jan Noriyuki <jan.noriyuki@puc.idaho.gov>
Subject: Public Comments on Case IPC-E-20-26

I would like to express some concerns I have with Idaho Power's application referenced in order no. 34728. My primary concerns are twofold:

1. Idaho Power has proposed grandfathering customers who interconnect a generation system to their system prior to December 1, 2020 under Schedule 84's present terms. Any customer generation projects begun on or after that date would be subject to any changes that might be made to Schedule 84 in the future. Our farm invested a significant amount of capital to construct two solar sites featuring 12 solar panels on dual-axis trackers. A significant amount of time was spent analyzing the proposed system, its cost, its expected return, and its payback period. We did not move forward with the project until we were very comfortable with the numbers behind our analysis. Idaho Power's proposal would render such financial analysis impossible for projects starting on or after December 1. It is unfair to deny grandfathering to such projects when no alternative plan has been presented. Simply put, we would never even consider such an expensive project if we knew that Idaho Power could potentially pull the rug out from under us with changes to the current compensation structure.
2. Irrigation customers should be granted the same 25-year grandfathering period as residential customers. Our systems are built to last at least that long and, as stated before, represent a significant financial investment.

On a more general note, I believe that customer generation represents a win-win scenario. It obviously benefits us as irrigators, or else we would not have invested in our system. But it also benefits Idaho Power and the company's other customers. The compensation we receive for solar generation is dollar-for-dollar—a rate much lower than what the company can turn around and sell that energy for to higher-paying residential and out-of-state customers. This is supported by the fact that Idaho Power is willing to compensate its irrigation customers for turning off their pumps during high-demand windows under its Irrigation Peak Rewards program and for upgrading irrigation systems to require less power. If my system is contributing to Idaho Power's bottom line, then it cannot follow that I am increasing costs for fellow customers.

I would also like to express two general concerns dealing with the program that aren't directly related to case IPC-E-20-26. The first has to do with Idaho Power's 100 kW limit on customer generation systems and the company's aggregation rules. The way these rules are applied creates design inefficiencies that are often purely arbitrary. For example, we had to abandon one potential solar site because we would not be allowed to aggregate that point of diversion with any of our other pumps, even though all of our pumps are under the same name and within about 10 miles of each other. There also seems to be little reason for us to have been required to build two solar generation sites within two miles of each other instead of just one, simply to avoid exceeding the 100 kW limit.

My second concern has to do with the company's responsiveness in completing the interconnection process. In the more than 60 years since my family began farming, we have had very positive experiences with Idaho Power. They have provided inexpensive, consistent electricity and have always been very responsive to outages or other problems. That is why I have been surprised with the pushback and lack of communication we received as our project

neared completion. The non-electrical portion of our system's construction was completed in mid-July. We scanned and emailed our design consent forms to the Idaho Power engineer on July 21. We expected to pass final inspections in the next few days and have our system energized in the first week of August. After three days with no response from Idaho Power, our solar system builder (AgriPower Solar) tried to follow up via email with the design engineer, who had also failed to respond to the electrical contractor who had questions regarding the project and specific placement of the new meter base.

On August 7, we received an email from the design engineer with official quotes for interconnecting our two systems. We immediately signed those forms and delivered them with payment, by hand, to Idaho Power's Pocatello office. Shortly afterward, we were notified by AgriPower Solar that they had spoken to Idaho Power's design engineer and that we would be required to level the road to one of the net meter bases before it would pass inspection. It's worth mentioning that Idaho Power has been using this same road to access our pump meter for decades. We leveled the road by August 13 and notified AgriPower Solar, who notified Idaho Power. After waiting for a week, the design engineer came out to the site in question, inspected it, left, and called AgriPower Solar to notify them that our road was not satisfactory and did not pass inspection. In each of these communications, Idaho Power's engineer blocked his telephone number and did not provide a way for us or AgriPower Solar to talk with him directly, so we were left without any clear direction on what work we needed to do to pass inspection. They also failed to move forward with our second site, which had nothing keeping it from passing inspection.

In order to resolve the issue and move forward, I called the Idaho Power supervisor in charge of our project. I explained the issue and expressed that we wanted to do whatever needed to be done to pass inspection, but that we were confused about exactly what issues were causing a hang-up for the design engineer. I also expressed how helpful it would be to talk with the engineer in real time to better understand and resolve whatever issues were pushing our interconnection back. The supervisor agreed with me, apologized for the miscommunication, and explained that we would need to gravel portions of our road to pass inspection.

At that point, we graveled nearly the entire roadway and notified the company. After more than two weeks without any word from Idaho Power, we began to feel that the company was intentionally stonewalling us. I once again talked to the company's supervisor, who came off annoyed and condescending on our phone call. A few days after September 8th's large windstorm, I called again to follow up on the status of our project. I was told, of course, that it would be moved back as the company worked to restore power to other customers. On September 29, the day after the IPUC public workshop, our interconnection process was finally completed and we began receiving credit for our generation.

I share this to demonstrate what I felt was an intentional effort to stonewall and push back against our solar project. Communication from Idaho Power seemed intentionally vague, and the interconnection process seemed to be dragged out way longer than necessary. This was not only a nuisance for us; it represented between \$3,000 to \$5,000 in lost generation from the beginning of August to the end of September.

Thank you for considering my comments and concerns. I look forward to IPUC's decisions on the case.

Regards,

Adam Young
1552 W Taber Rd
Blackfoot, ID 83221-5022
(208) 680-0885