

From: [Joseph Goodman <joe@agripowersolar.com>](mailto:joe@agripowersolar.com)
To: [Jan Noriyuki](#)
Cc: [David Havel](#); [Aaron Pace](#)
Subject: Comments for the Idaho PUC from Joe Goodman, President of Agripower Solar Co. Regarding case #IPC-E-20-26
Date: Tuesday, October 27, 2020 5:56:09 PM

To the Idaho Public Utilities Commission and Whoever it May Concern,

Dear Commissioners,

Thank you very much for your willingness to accept and review comments from the public regarding case #IPC-E-20-26.

My name is Joe Goodman, and I am the President of Agripower Solar. Agripower Solar is a company focused on designing, engineering and installing renewable energy systems which are specifically customized to suit the needs of agricultural businesses. Our goal is to help the farmers, dairymen and women and ranchers in Idaho and the Rocky Mountain region to generate clean energy, and to help them offset some of the significant energy costs associated with raising their crops and livestock. The attainment of this goal will not only result in a cleaner and better environment, but will also enable our clients to be able to better compete in our national and global economies.

I would like to begin with a compliment to Idaho Power. Our interactions with IPC representatives during the past several years have been mostly very positive and productive! As a renewable energy engineering firm, we understand and appreciate the importance of supporting those utility companies which are good partners with the community in pursuing the implementation of long-term clean energy solutions. We believe Idaho Power has been a good partner and we sincerely appreciate their efforts to make net metering a successful program with their customers!

As you consider the current proposal before the Commission, I believe it is important to consider the long-term goals of Idaho Power in making the proposal. In short, Idaho Power hopes to be able to limit the duration of the rate structure associated with the current net metering program outlined in tariff #84 for those irrigators who are currently net metering customers, AND to be able to limit and control the number of new net metering customers going forward, AND to ultimately have the freedom to reduce the credit rates given to their net-metering customers.

1. **Grandfathering term of AT LEAST 25 years for existing net-metering irrigators:** As Idaho Power is a “for profit” company, we believe it is reasonable for Idaho Power to have some control over the costs of the energy for which they give credit to new net metering customers. However, we do NOT believe it is reasonable for them to seek to change the terms of the net metering arrangement for those few irrigation net-metering customers who relied on the terms given them by Idaho Power when designing and installing their systems. If any time limit to the net metering credit structure is set for existing net metering irrigators, we believe the period should be a minimum of 25 years *from the date of officially implementing the new net metering program*. Our systems have warranties which extend for

25 years and we genuinely believe our APS systems will have lifetimes of 30-40 years.

2. **New Net-Metering Program MUST be in place before “Cut-Off Date”**: It is critical for the PUC to understand that establishing an effective cut-off date for the current net-metering program without having a well-defined, new and comprehensive net metering program established by the IPUC will effectively kill all net metering opportunities for pumpers and irrigators who are customers of Idaho Power! When choosing to install solar on a residence, it is conceivable that persons would go forward with the relatively small investment for their rooftop solar without knowing what the new program would be. Not so when dealing with farmers or ranchers who cannot take a gamble on a million dollar system when they don't know what the new terms of the net metering program will be. PLEASE, PLEASE, PLEASE do not establish an effective cut-off date to the program and net metering terms defined by tariff 84 until the new net metering program is clearly defined and in place!

3. **We will support Idaho Power in its ultimate goal of reducing the credit value given for off-season over production KW hours.**

Although it will result in a lower ROI and a longer “pay-back” period for our systems and our clients, we would support Idaho Power if it proposes reducing the value of off-season over production credits given to new net metering customers. Idaho Power currently gives a net-metering credit of roughly \$.067 per KW hour to irrigators for energy generated during the “off-season.” In order to make additionally long-term net-metering opportunities more attractive to Idaho Power, we would support IPC if they were to propose reducing the “off-season” over-production credit rate from \$.067 to \$.050 per KWh for the new irrigator net metering program.

4. **Increase system size cap amount from 100KW to 1000KW**

The current cap of 100KW per meter for irrigators often does not make sense. As we design energy production systems to help farmers and other agricultural business to offset THEIR OWN USAGE, the cap currently in place sometimes results in system designs which are less than 100% efficient. It also results in our clients needing to aggregate multiple meters to try to offset as much of their usage as possible. This can result confusion and additional work for both the Ag Business Owner and IPC.

5. **Federal Financial Incentives Currently Exist for Rural Business Owners who Implement Renewable Energy:**

As I am sure the Commission is aware, there are currently Federally funded incentive programs in place designed to incentivize rural business owners to install renewable energy systems on their property. Farmers in many other parts of the country are taking advantage of these programs and becoming more competitive in their industries. It is important that the Idaho PUC establish policies which will enable Farmers, Dairymen and women, and Ranchers in Idaho to also benefit from these financial incentives while they exist, and not implement policies which would impede them from doing so.

6. **Irrigation Net-Metering Customers Continue to pay Significant Demand Charges to IDAHO POWER even with their own Generation:** Unlike residential net metering accounts, the average annual demand charges for the Idaho Power's Ag business customers (i.e pumpers

and irrigators) are roughly 25%. This means a farmer or rancher can install a system which will literally generate every KW hour they will use during a year, and they will still continue to have to pay a very significant amount of money to Idaho Power every year. When we meet with our clients, they are often opposed to this notion, but we explain that it is reasonable given that Idaho Power is maintaining the grid which acts as their battery. This is an important difference between a residential net metering customer and an irrigation generator customer. There are many other very significant advantages to Idaho Power which accrue from getting their customer-generated energy from irrigators vs other classes of customers. (i.e. Idaho Power gives smaller credits for each KW hour generated to irrigators, irrigators are usually larger scale generators which results in far less administrative work for Idaho Power per KW hour generated. The production curves of our APS systems are very flat, relative to roof mounted systems, meaning much greater energy production late in the day when demand is peaking and energy is worth a premium!)

Thank you very much for considering my comments!

Best wishes!

Sincerely,

Joe Goodman
APS, President
joe@agripowersolar.com

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From: [PUC Consumer Comments](#)
To: [Jan Noriyuki](#)
Subject: Notice: A comment was submitted to PUCWeb
Date: Wednesday, October 28, 2020 7:00:04 AM

The following comment was submitted via PUCWeb:

Name: Tyler Pratt
Submission Time: Oct 27 2020 7:27PM
Email: livinglegacydesign@gmail.com
Telephone: 707-307-3936
Address: 147 Ellsworth Rd
Pocatello, ID 83202

Name of Utility Company: Idaho Power

Case ID: IPC-E-20-26

Comment: "Dear Commissioners, Please reject Idaho Power's request for changing the net metering rules for agricultural net metering customers. As a farmer in Idaho Power's service area, we are hopeful to one day soon install a solar array for our pumping and food preservation and storage needs. If Idaho Power's request to cut off the application date for net metering customers is granted, without any discussion of how the rates will be affected, they are certain to petition the IPUC soon thereafter for rates that disincentive customer generation. However, the primary reason I believe you should reject Idaho Power's petition is because they have yet to do a complete valuation study for customer generated power. Before making changes to a rule that will be difficult if not impossible to retract, it is important that a full and complete study be given to both the pros and cons of net metering on the grid. Currently, Idaho Power generally makes the case that net metering customers negatively impact the grid, but they fail to acknowledge that there are actually numerous benefits to having distributed generation in their service area. "

From: [PUC Consumer Comments](#)
To: [Jan Noriyuki](#)
Subject: Notice: A comment was submitted to PUCWeb
Date: Wednesday, October 28, 2020 8:00:05 AM

The following comment was submitted via PUCWeb:

Name: Amy Little
Submission Time: Oct 28 2020 7:55AM
Email: amymlittle@gmail.com
Telephone: 208-995-5518
Address: 9648 West Moonlight Drive
Boise, ID 83709

Name of Utility Company: Suez

Case ID: SUZ-W-20-02

Comment: "There is absolutely no acceptable reason to hike our water bills to pay for infrastructure that is caused by massive population influx. That infrastructure should be paid for by both the DEVELOPERS of the land AND the NEW customers. It is not at all fair to raise the rates of existing customers when we're not the reason for the infrastructure investments. "

Idaho Public Utilities Commission
11331 W. Chinden Blvd.
Boise, ID 83714

from:
Michael Engle <mike.w.engle@gmail.com>
Chair, Portneuf Resource Council
Pocatello, Idaho

October 27, 2020

Re: Case # IPC-E-20-26, Idaho Power solar program changes for farms and businesses

Dear Commissioners,

We are a group of organizations that represent thousands of members in the state who are Idaho Power customers. **We are writing to express our concerns about Idaho Power's recent proposal to change its solar net metering program for heavy use customers such as farms and businesses.** We believe these changes would make it harder for farmers and business owners to 'go solar' in the future and impact the financial investments of those who currently have solar energy systems.

Idaho's agriculture is a pillar of the state's economy and a vital piece of this state's history and culture. The option of solar power generation for farmers will be essential to control their growing power costs, build resilience, and gain energy independence as the state and Idaho Power transition towards a clean energy future. The success and recent growth of Idaho Power's irrigation net metering program—that this Commission approved years ago—is proof that **this program is economically beneficial for farmers in Idaho**, who are actively seeking solutions like solar to lower and stabilize their energy costs.

Idaho Power's proposal would stifle this successful program by granting legacy status to existing systems on December 1 of this year, allowing those customers to continue with the current program while sending a strong message to anyone who wants to go solar *after* that date that significant changes in the program are on the horizon. **The resulting “wait and see” period would be unfair to those farmers and business owners in the months and perhaps years until Idaho Power develops its new solar partnership program.** Creating this period of significant uncertainty reduces the resilience of Idaho's agricultural sector, takes rights away from farmers, and creates a barrier in a farmer's ability to make the best decision for the future of their operation.

We urge you to delay the legacy status effective date for this program until Idaho Power has a new and fair replacement program in place, so that farmers and business owners who wish to invest in solar, now and in the future, have a program that they can evaluate and make sound decisions from.

And when the legacy status date is established, the period must be for at least 25 years, consistent with the period that you granted residential customers last year. Idaho Power's proposal of 10 years is unfair to the farmers and business owners who have invested their hard-earned dollars in solar energy systems that last 25+ years and who deserve some consistency in their projected payback period.

Additionally, we urge you to lift the arbitrary 100 kilowatt-per-meter cap on customer-owned solar installations that creates significant financial and logistical barriers for farmers and business owners who deserve the ability to invest in solar energy systems that are large enough to meet their energy needs.

Idaho has a proud history of resilience and independence, with farmers at the heart of that history. Today, in the face of an ever-changing energy landscape, it is essential that Idaho farmers are given the ability to maintain those qualities through policies and programs that provide clear, reasonable, and assessable energy choices centered around a clean energy future. Idaho Power's proposal would accomplish the opposite. Solar irrigation capacity is only 0.7% of Idaho Power's current system load, even after significant recent growth. ***Please don't let Idaho Power restrain a program that affects its system so little but benefits individual farmers so much.***

Respectfully,

Associated Students of Boise State University
(ASBSU) Sustainability Committee
Boise Bicycle Project
Citizens Climate Lobby Boise
Citizens Climate Lobby Pocatello
Climate Action Coalition of the Wood River Valley
Conservation Voters for Idaho
Idaho Organization of Resource Councils
Idaho Rivers United

Idaho State University Sustainability Club
Portneuf Resource Council
Snake River Alliance
Sun Valley Institute for Resilience
U.S. Green Building Council, Mountain Region
Visión 2C Resource Council (Canyon County)
Weiser River Resource Council
Winter Wildlands Alliance