

Joshua Hill
Idaho Solar Owners Network
1625 S. Latah
Boise, ID 83705
P.O. Box 8224
Boise, ID 83707
Telephone: (208) 917-3757
Email: joshuashill@gmail.com
Admin copy: tottens@amsidaho.com

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER
COMPANY'S APPLICATION TO INITIATE A
MULTI-PHASE COLLABORATIVE PROCESS FOR
THE STUDY OF COSTS, BENEFITS, AND
COMPENSATION OF NET EXCESS ENERGY
ASSOCIATED WITH CUSTOMER ONSITE
GENERATION

CASE NO. IPC-E-21-21

IDAHO SOLAR OWNERS NETWORK
COMMENTS ON CASE

1. Idaho Solar Owners Network, Intervenor, hereby files comments on Case IPC-E-21-21 pursuant to Rules of Procedure 71 through 75 of the Idaho Public Utilities Commission, ID APA 31.01.01.071-.075 as follows: The name and address of the intervenor is:

Joshua Hill
Idaho Solar Owners Network
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Boise, ID 83705
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2. Without a comprehensive general rate study to solve the underlying rate issues across all residential customers, any study of on-site generation customers will result in a discriminatory analysis. The current rate structure issues prohibit accurate and fair study of on-site generation customers. On-site generation functions within the largest customer class, and uses that rate design as its foundation. New rate design for on-site generators cannot be finalized until a new accurate fixed cost and costs of service to all customers exists within the current rate structure for all residential customers. We expect that Idaho Power will provide all assumptions and foundations in this study to be used in future rate studies as we believe that any cost study must

match the cost for general rates among the larger customer class without on-site generation. Discriminatory rates must not follow from the outcome of this study. The language of the study must also be unbiased toward any other customer class.

3. The separate rate class for on-site generation customers is not meant to be discriminatory, and the study of these customers must properly and fairly assess the benefits of all types of distributed energy resources (DERs). All DERs should be studied using the same practices that the electric industry has used to assess the cost effectiveness of long-term energy efficiency and demand response resources. The United States military commonly uses micro-grids and on-site generation to reduce transmission costs, the current and future value of these type of systems must be determined. Value must also be provided for all benefits related to on-site generation including increased resiliency, decreased transmission distance, investment in new generation avoided by Idaho Power, environmental benefits, land use conservation, economic impact, etc.
4. The value of distributed electricity provided by on-site generators who have also invested in on-site storage will need to be studied and factored into future rate designs. The study should create a comprehensive value for access to stored power, specifically values that might be provided in emergency situations where costs associated with power outages can be avoided. For example – a network of homes designed with solar and storage could provide power during a blackout to not only themselves, but potentially a hospital or school to be used as fully micro-grid powered community center.
5. The cost to serve on-site generation customers due to the value of the kWh's they provide may be lower than the cost to serve all other customers. There has always been a substantial load and usage variation among the residential class, even when excluding customers who can self-generate. For example, usage patterns will be very different for those working at home (a bigger trend brought on by the pandemic); those working at night; those retired citizens; or stay at home parents, etc. - but all are classified as residential class. If Idaho Power undertakes an unbiased look for groups whose load shapes vary from the class average, rather than singling out solar customers and searching for a justification to treat them differently, they may find many groups of users that affect distribution costs even more than solar customers.
6. The utility should distinguish the difference in the lower amount of power a solar customer uses versus a non-solar customer who has installed energy saving technology, including appliances, smart devices, increased insulation, etc in order to significantly reduce their power bill. Justification is needed as to why that form of dropping energy usage should be rated differently from the lower energy usage caused by solar systems, specifically those that offset only part of

customer use, and what effect any forms of energy conservation have on the costs and benefits to Idaho Power in the transmission and distribution of energy. Lowering peak demand has a value which should be determined and be applied across all customers.

7. The value of providing electricity to the grid during peak load times for the residential class should be explored fully. The exports that DG customers deliver to the grid are a generation service which they provide to the utility, not a service which they receive from the utility. The utility then delivers those exports to nearby neighboring customers and is fully compensated for that power even though the costs to distribute to that customer have been drastically reduced, therefore a true analysis of costs and benefits should recognize that customers farther from any generation source are more expensive to serve due to distance but are subsidized by those closest to the source as the rates charged for distribution do not vary by distance. In addition, a solar customer uses the distribution system less than a regular non-solar customer of comparable size, and provides the utility with significant benefits by reducing peak loads on the distribution system. The comprehensive value of infrastructure upgrades by on-site generation customers must be provided as an outcome of the study.
8. Rates for all customers, including those who install solar should be based on the utility's cost to deliver power to that customer group. Idaho Power should look at the impact of other rate classes on overall budget, and other subsidies in other rate classes in a separate general rate case. Ideally, the outcomes of a general rate case would be used to create a foundational rate for cost of service to all customer classes and schedules. Any outcome from study of on-site generation customers should not be used in a general rate case, to avoid discriminatory rates. Customers can install on-site generation, and these systems can be turned off or removed, either temporarily or permanently. The basic rates for service therefore cannot vary among these classes.
9. ISON joins the City of Boise comments concerning environmental concerns and processes to study their impact as listed in their "Informal Comments on the Proposed Study Design to Determine the Costs and Benefits of Distributed Generation - IPC-E-21-21". In addition to these environmental factors, ISON would also like Idaho Power to address impacts on land use – specifically costs of large scale centralized renewable generation systems versus potentially using only rooftop surface area to achieve the same goals.
10. The value of Idaho Power capital investments do not expire and customers who have invested in solar should be given that same consideration and thus. Net metering credits should not expire, but rather should have a yearly value assigned that customers accumulating them can redeem rather than having these credits roll forward. The related issue of on-site generation systems being

capped, regardless of use, should be eliminated as a result of this study. Reasonable values should be given to “cashing out” credits by customers – as a base, 10% of the value could be taken by Idaho Power to ensure their profit remains intact, while the remaining value the kWh’s were sold for to other customers is provided to the on-site generation owner.

11. After completion of the study internally by Idaho Power we suggest that a Technical Advisory Committee with experts designated by the Company, the Commission, and stakeholders be convened to select an independent, unbiased third-party to review the conclusions of the study.
12. ISON fully agrees with all comments in the final draft by the City of Boise. Our members echo their concerns and recommendations.

Dated this 16th day of November, 2021

Joshua Hill, president

Idaho Solar Owners Network

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 13nd day of October 2021, I served a true and correct copy of the foregoing document(s) upon the following person(s), in the manner indicated:

Joshua Hill
Idaho Solar Owners Network

Electronic mail only (See Order 34781):

IDAHO POWER COMPANY: Lisa D. Nordstrom
(Exhibit Nos. 1-100) Idaho Power Company
1221 W. Idaho St. (83702)
PO Box 70
Boise, ID 83707-0070
E-mail: lnordstrom@idahopower.com
dockets@idahopower.com

Connie Aschenbrenner
Idaho Power Company

1221 W. Idaho St. (83702)
PO Box 70
Boise, ID 83707-0070
E-mail: caschenbrenner@idahopower.com

COMMISSION STAFF: Erick Shaner
(Exhibit Nos. 101-200) Deputy Attorney General
Idaho Public Utilities Commission
11331 W. Chinden Blvd., Bldg No. 8,
Suite 201-A (83714)
PO Box 83720
Boise, ID 83720-0074
E-mail: erick.shaner@puc.idaho.gov

INDUSTRIAL CUSTOMERS OF Peter J. Richardson
IDAHO POWER: Richardson, Adams, PLLC
(Exhibit Nos. 201-300) 515 N. 27th Street
PO Box 7218
Boise, ID 83702
E-mail: peter@richardsonadams.com
Dr. Don Reading
6070 Hill Road
Boise, ID 83703
E-mail: dreading@mindspring.com

IDAHYDRO: Tom Arkoosh
(Exhibit Nos. 301-400) Arkoosh Law Offices
913 W. River St., Suite 450
P.O. Box 2900
Boise, ID 8370
E-mail: tom.arkoosh@arkoosh.com
erin.cecil@arkoosh.com

IDAHO CONSERVATION LEAGUE: Benjamin J. Otto
(Exhibit Nos. 401-500) Idaho Conservation League
710 N. 6th Street
Boise, ID 83702
E-mail: botto@idahoconservation.org

IDAHO CLEAN ENERGY ASSOCIATION: Kevin King
(Exhibit Nos. 501-600) Idaho Clean Energy Association
PO Box 2264
Boise, ID 83702
E-mail: staff@idahocleanenergy.org

CLEAN ENERGY OPPORTUNITIES Michael Heckler
FOR IDAHO: Courtney White
(Exhibit Nos. 601-700) Clean Energy Opportunities for Idaho Inc.
3778 Plantation River Dr., Suite 102
Boise, ID 83703
E-mail:
mike@cleanenergyopportunities.com

courtney@cleanenergyopportunities.com

Kelsey Jae
Law for Conscious Leadership
920 N. Clover Dr.
Boise, ID 83703
E-mail: kelsey@kelseyjae.com

IDAHO SOLAR OWNERS NETWORK: Joshua Hill
(Exhibit Nos. 701-800) Idaho Solar Owners Network
1625 S. Latah
Boise, ID 83705
E-mail: joshuashill@gmail.com
tottens@amsidaho.com
MICRON TECHNOLOGY, INC: Jim Swier
(Exhibit Nos. 801-900) Micron Technology, Inc.
8000 South Federal Way
Boise, ID 83707
E-mail: jswier@micron.com

Austin Rueschhoff
Thorvald A. Nelson
Austin W. Jensen
Holland & Hart, LLP
555 17th Street Suite 3200
Denver, CO 80202
E-mail: darueschhoff@hollandhart.com
tnelson@hollandhart.com
awjensen@hollandhart.com
aclee@hollandhart.com
glgarganoamari@hollandhart.com

CITY OF BOISE: Ed Jewell
(Exhibit Nos. 901-1000) Deputy City Attorney
Boise City Attorney's Office
150 N. Capitol Blvd.
PO Box 500
Boise, ID 83701-0500
E-mail: ejewell@cityofboise.org
boisecityattorney@cityofboise.org

KIKI LESLIE A. TIDWELL, *pro se*: Kiki Leslie A. Tidwell, *pro se*
(Exhibit Nos. 1001-1100) 704 N. River St. #1
Hailey, ID 83333
E-mail: ktinsv@cox.net

IDAHO IRRIGATION PUMPERS ASSOCIATION, INC: Echo Hawk & Olsen PLLC
(Exhibit Nos. 1101-1200) 505 Pershing Ave., Suite 100
PO Box 6119
Pocatello, ID 83205

E-Mail: elo@echohawk.com

RICHARD E. KLUCKHOHN, *pro se* AND Richard E. Kluckhohn, *pro se*
WESLEY A. KLUCKHOHN, *pro se*: Wesley A. Kluckhohn, *pro se*
(Exhibit Nos. 1201-1300) 2564 W. Parkstone Dr.
Meridian, ID 83646
E-Mail: kluckhohn@gmail.com
wkluckhohn@mac.com

ABC POWER COMPANY, LLC: Ryan Bushland
(Exhibit Nos. 1301-1400) ABC Power Company, LLC
184 W. Chrisfield Dr.
Meridian, ID 83646
E-mail: ryan.bushland@abcpower.co

Comet Energy, LLC: George Stanton
(Exhibit Nos. 1401-1500) Comet Energy, LLC
13601 W. McMillan Rd, Suite 102
PMB 166
Boise, ID 83713
E-mail: George.stanton@cometenergy.biz

IDAHOME SOLAR, LLC: Tyler Grange
(Exhibit Nos. 1501-1600) Idahome Solar, LLC
2484 N. Stokesberry Pl. #100
Meridian, ID 83646
E-mail: tyler@idahomesolar.com