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IDAHO PUBLIC
UTILITIES COMMISSION

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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

**RICHARD E. KLUCKHOHN'S &
WESLEY A. KLUCKHOHN'S**
COMMENTS ON CASE

1. Richard E Kluckhohn & Wesley A. Kluckhohn (Kluckhohn's), 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:

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2. The analysis within the study must be non-discriminatory, fair, equitable, and credible.
3. For this & future studies to be nondiscriminatory the study must use the same methodology for all customers and all residential classes. Thus significant consideration must be given to assure that the methodology utilized in this study does not create a bias, discriminatory affect when utilized on other residential classes customers.
4. A study of approximately .2% of Idaho Power Companies (IPC's) customer base could easily create a significant bias within the study causing an inadvertent discriminatory outcome.

5. The residential solar generator must be considered a sub-class of all residential customers, and what applies to one applies to the others. By the act of flipping a switch the residential solar generating customer may remove their generation system from grid and thus become a general residential customer.
6. The study must have a high degree of transparency with all assumptions identified and footnoted in a manner that is understandable by the general public. Failure to do so eliminates transparency and the ability of the public, if they so choose, to participate in a knowledgeable manner.
7. The study must be digestible and understandable by the general public.
8. This study appears to be premature, as a predecessor study regarding rate structures across all residential classes needs to be performed to set many of the factors for this cost study. We are stuck with the classic chicken and the egg scenario. At a minimum a general rate study should occur simultaneously with this study so the decision about assumptions within both studies are made from a systemic (both rate and cost) perspective.
9. The study's foundation should be based on the future values vs only a historic based analysis. (i.e.) Given future consumer demand is highly likely to be greater than the historic consumer demand and given the nature of IPC's cost structure, the majority being fixed costs, the analysis must be based on future vs past values, thus allocating the costs over a more realistic basis. Basing the study on past values will potentially create biases within the study by allocating the cost burden inaccurately between classes.
10. I fear that any cost study that does not use a uniform methodology to evaluate the costs for all classes within the IPC system will be potentially create a report that is biased, discriminatory, and unfair to some class.

WHEREFORE, the Kluckhohn's, customers of Idaho Power, respectfully formally submit these comments to the Commission.

DATED this 13th day of October 2021..

Respectfully submitted,

/s/ Richard E. Kluckhohn
Richard E. Kluckhohn

/s/ Wesley A. Kluckhohn
Wesley A. Kluckhohn

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 13, 2021, a true and correct copy of the above and foregoing document was forwarded addressed as follows via eMail:

- | | | |
|--|--------|-------------------------------------|
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Commented [KK1]: Why are these two different? Should they be a single cell?

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s/ Richard E Kluckhohn
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