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IDAHO PUBLIC
UTILITIES COMMISSION

October 28, 2021

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

Public Hearing Comments Re: *IPC-E-21-21, Idaho Power Application To Initiate A Multi-Phase Process For The Study Of Costs Benefits And Compensation Of Net Excess Energy Associated With Customer On-Site Generation*

Good Evening Commissioners,

My name is Lisa Young. I'm the Director for the Idaho Chapter of the Sierra Club, speaking today on behalf of over 10,000 members and supporters in southern Idaho, many of whom are Idaho Power customers, and many of whom are interested in owning a solar system to help meet their energy needs. I will be submitting *written* comments on this case before the comment deadline, but appreciate the opportunity to speak with you during the hearing tonight. Thank you for offering this forum to hear directly from customers and other stakeholders.

Our members and supporters are also eager to submit their own personal written comments over the next few weeks, since this is an issue that they care deeply about and that directly impacts them, and I want to thank you in advance for taking the time to read and consider each of their comments, as well.

I'll start by saying that it's no secret that our organization and its members care a lot about the health and wellbeing of the so-called "natural world." But what motivates many of us is how the environment ultimately impacts *people, communities* and the *economy*, which of course are inextricably linked. Harm to the environment does harm to families and businesses. And benefits to the environment provide benefits to families and businesses.

And these costs and benefits *can* be measured. Numerous studies have assessed and quantified the tangible environmental benefits from distributed customer-owned solar, ranging from lower public health costs from cleaner air to local green job development to strengthened grid resiliency in the face of climate change impacts.

That's why we were so disappointed to see Idaho Power's proposed study framework present such a weak and empty "Environmental Benefits" section. Despite being provided with the PUC Staff's five specific suggested measurements for this section, and telling us in its reply comments in Case IPC-E-20-26 that they would indeed use those as the basis for this study, Idaho Power left the specifics for this section blank in its latest proposal. It just said "Evaluation of the quantifiable environmental and other system benefits." The Commission has already directed



Rocky Mountain Power in Case PAC-E-19-08 to analyze those five specific environmental benefits that PUC Staff previously outlined in its own identical solar study. Idaho Power should be required to do the same, for a sound and well-rounded analysis and to ensure fairness between Idaho Power and Rocky Mountain Power customers in Idaho. For Idaho Power to remove details like this from its own “Environmental Benefits” section of this study leaves us concerned that it’s trying to avoid analyzing these critical metrics.

For too long, the very real environmental costs and benefits of infrastructure projects have been swept aside and disregarded. They must be accurately studied and quantified, particularly as environmental changes continue to have a greater and greater impact on our cities, our communities, our homes, our grid, and consequently our economy and the public at large.

Please direct Idaho Power to, at the very least, study the exact same parameters as Rocky Mountain Power in its “Environmental Benefits” section of its customer solar study, and consider the recommendations by several other intervening parties who have already provided feedback on that section, as well.

On behalf of Sierra Club members I want to thank you, again, for hosting this forum for public comment and hearing our concerns and suggestions. We look forward to continue engaging in this important process as it moves forward.

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Lisa Young
Director, Idaho Chapter Sierra Club

Rocky Mountain Power Solar Study Parameters (PAC-E-19-08, Order 34753):

Avoided Environmental Costs and Other Benefits

- 15. Quantify the potential value of grid stability, resiliency, and cybersecurity protection provided by on-site generators as a class and different penetration levels.*
- 16. Quantify the value to local public health and safety from reduced local impacts of global warming such as reduced extreme temperatures, reduced snowpack variation, reduced wildfire risk, and other impacts that can have direct impacts on Rocky Mountain Power customers.*
- 17. Quantify local economic benefits, including local job creation and increased economic activity in the immediate service territory.*
- 18. Quantify the possible net value of Renewable Energy Credit sales produced by net metering exported energy.*
- 19. Quantify the reduced risk from end-of-life disposal concerns for the Company compared to fossil-fueled resources*



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