

**From:** [Kevin Bradshaw](#)  
**To:** [Jan Noriyuki](#)  
**Subject:** Solar Panel Discussion  
**Date:** Tuesday, November 30, 2021 6:09:57 PM

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## IPC-E-21-21

I am writing to express my support for solar energy panels for residential homes and being a part of "net metering", environmental solutions to help with low carbon and no carbon emissions and economic benefits.

It is a critical time to speak up for an electric grid that fosters energy independence, the creation of green jobs, and the public's best interests by growing solar use!

The public has made it clear that individually-owned rooftop solar systems and other distributed energy systems should remain a viable economic and environmental solution for businesses, homeowners, and government agencies.

We've seen Idaho residents demand this for a variety of reasons, including:

Idaho Power has a 100% clean energy goal - let the public join in and contribute to that goal with fair programs

Customers of all types deserve programs that help make the right choice for their family's energy use, ensuring pathways to universal access for all Idaho residents to participate in energy production

Local clean energy systems provide grid security and reliability while protecting our climate and public lands from catastrophic events like wildfires

Distributed energy system owners should be fairly compensated for the services they provide and programs should enable a local energy economy

Thank you for placing this into the discussion.  
Kevin

Kevin Bradshaw  
1193 Eastridge Cir  
Twin Falls, ID 83301  
208-212-0265

**From:** [William McCombs](#)  
**To:** [Jan Noriyuki](#)  
**Subject:** Stand up for solar! Case Number: IPC-E-21-21.  
**Date:** Tuesday, November 30, 2021 7:24:07 PM

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Dear Idaho Public Utilities Commission Commission Secretary,

With the amount of Solar available in Idaho, it is an important player in Idaho's clean energy future! I have a significant investment in solar and want to expand. Having lived in Florida and worked with Volusia county in emergency preparedness, I realize how important emergency power can be from outages during hurricanes/tornados and fires as well as clean energy. The use of generators, etc during long term outages has its own issues that solar doesn't have. Plus solar provides reserve energy that may not be available from other sources.

I would like the study to be fair, conducted by a neutral outside party and provide fair compensation to those who have made this long term investment. A significant portion of my solar goes to the utility that is not compensated.

Regards,  
William McCombs  
9925 ID-52  
Horseshoe Bend, ID 83629

**From:** [Rod Fonda](#)  
**To:** [Jan Noriyuki](#)  
**Subject:** Stand up for solar! Case Number: IPC-E-21-21.  
**Date:** Tuesday, November 30, 2021 9:15:32 PM

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Dear Idaho Public Utilities Commission Commission Secretary,

My wife and I have had rooftop solar for 3 years, so we are grandfathered in. New solar customers should have the same opportunities we had, at the same rates. Idaho Power may not think it needs the power produced by rooftops, but the facts say otherwise. Last summer the power grid was stressed; rooftop solar can help. Idaho Power wants to have clean power within the next few years; replacing coal with hydroelectric is a step in the right direction, but solar is much better environmentally than hydro. Ask the salmon! I attended the hearing in Boise in December, 2019. It was an impressive assembly of concerned Idaho citizens from all walks of life, young and old, some prosperous and some not so prosperous. All had installed solar for their own combination of reasons, but that decision involved weighing an uncertain financial cost. To encourage solar--not to mention to stabilize the fragile solar installation industry--it is very important that the rates people need to contemplate encourage them to take the plunge and install solar. We should also be encouraging the power company to consider solar farms--we make far more solar power up in Blaine county, even in winter, than we do in the California desert. There just is no excuse anymore to ignore what we can do for this planet when we power up from the sun!

Regards,  
Rod Fonda  
PO Box 3649  
Hailey, ID 83333

**From:** [Claudia Fernsworth](#)  
**To:** [Jan Noriyuki](#)  
**Subject:** Case # IPC-E-21-21  
**Date:** Tuesday, November 30, 2021 9:20:09 PM

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Claudia Fernsworth  
8088 W Pocono Lane  
Boise, ID 83714

Dear Commission Secretary,

I am an Idaho Power customer. It just makes sense to encourage as many people as possible to join in reducing our dependence on non renewable energy sources. People contributing to Distributed Energy programs should be fairly compensated .

**From:** [Alex McKinley](#)  
**To:** [Jan Noriyuki](#)  
**Subject:** Comment: IPC-E-21-21  
**Date:** Tuesday, November 30, 2021 10:23:40 PM

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Concerning case number: IPC-E-21-21

I am writing to the commission to ask that the cost benefit study of distributed generation that is to be undertaken, be done so in a fair, transparent, and comprehensive manner. In order for the outcome of this study to be considered a credible result it is imperative that the full range of costs and benefits be accounted for.

IPC presupposes the result of the study in the initial application – “The Company's primary objective of the study process is to establish a sustainable on-site generation offering that limits subsidies by implementing a more equitable pricing and compensation structure.” By initiating the process with the assumption that the current on-site generation agreement is not equitable, IPC demonstrates that they have a desired outcome that is not based on the result of a thorough and unbiased study. Unfortunately, it now becomes the duty of the commission to assure that the cost/benefit analysis is fair and comprehensive. IPC has done a thorough job in their initial filing and subsequent comments of discussing the cost side of the equation. The commission must ensure the benefits are included and weighted appropriately.

In comments, Idaho Power Company (IPC) spends a significant amount of time focusing on billing structure, but this is intended to be a study of the cost and benefits of distributed generation, not rate structure design. These are different items and IPC is putting the cart before the horse because an informed rate design should result from the findings of the cost benefit analysis. For example, a potential outcome of this study could be that costs and benefits of distributed generation are different for different seasons/times of day/etc... If that were the case, that could inform future rate design. Furthermore, rate design should not be done when only considering one specific group of customers. In order to best fulfill their duty, the PUC should advocate for an additional study to inform rate design over a wide range of customer types (costs/benefits of rural vs. urban customers or full time vs. part time customers, etc..., etc..., there are many groups that use electricity differently). The current study should be a cost/benefit analysis, not a rate design.

An independent 3rd party designing and conducting this study with input from parties involved would lend credibility to the outcome. Staff states, “if a third-party contractor does perform the study, funding to conduct it and who will pay for it, customer generators or all customers, will need to be identified.” This is true, but should not preclude a third party from conducting this study. The idea that since IPC is happy to cover the cost of the study, it should design and conduct the study, runs very contrary to the goal of a fair, balanced, transparent, and legitimate cost/benefit study. The commission should strongly consider enlisting a third

party. In addition, within the current proposal the public cannot weigh in on the details and specifics of how this study will be conducted. The details are complicated, but they are what matter. In order for the study to be transparent a comment period after initial study design should exist.

IPC is granted a monopoly and the PUC needs to ensure that the customers in IPC's service area are treated fairly, that begins with a study which includes the benefits of distributed generation. When biased cost/benefit studies of customer generation are conducted, the result has a chilling effect to the growth of customer generation. IPC continually touts the goal of 100% renewable generation in advertising. In the most recent Integrated Resource Plan (IRP) IPC has a substantial portion of the preferred portfolio assigned to solar. IPC obviously sees the value of solar generation, but the PUC needs to make sure that the value of distributed generation is accounted for in this study. IPC seems to frame the issue as customers with distributed generation vs. customers without distributed generation. The PUC however should not see these as different groups. Customers currently without distributed generation are very likely customers who in the future will have distributed generation or will benefit from those who do.

Many of the interveners have provided significant resources designed to help the commission appropriately value the benefits of distributed, customer owned, generation. IPC however has provided only cursory mention of environmental and other benefits with no detail as to what would be included in a study. The study should be designed to value benefits such as:

- How distributed solar generation adds to the reliability and resilience of our power grid. The importance of this will only grow as our region experiences more droughts, heat waves, wildfires, and other events that stress the network. We saw this first hand this past summer.
- Investment in distributed generation by customers reduces Idaho Power's need to invest in their own centralized production facilities. This saves all customers money in the long run.
- Customers with solar can have predictable electricity bills for years to come. As our region grows and weather events impact the price of electricity more frequently, solar can help individual customers maintain affordable utility bills.
- Producing clean energy at a local level can help IPC meet the stated goal of 100% clean energy by 2045.
- Local electricity production reduces the need for Idaho Power to purchase electricity from other utility companies during high demand times.
- The majority of our state is currently experiencing "severe", "extreme", or "exceptional" drought conditions. Diversifying our energy resources with distributed solar will help our electricity system be more resilient and buffer us from future drought related price increases. It will also make water available for other uses. Water is a scarce resource, especially in a rapidly growing region.
- As previously stated, IPC's most recent IRP proposes to add a great deal of solar, therefore IPC sees a value in solar. Customers should be able to take advantage of this value, not only

the utility company.

- A robust and dynamic electric grid is important as homeowners rapidly adopt electric vehicles. The PUC should consider the long-term negative ramifications of a biased cost/benefit study. Electric F150s are not 10 years away, our grid is changing as this case plays out. A biased study, that slows the transition to a dynamic power grid, will hurt all customers.

Over the last few years the public has expressed its alarm that the PUC may put IPC's short term financial benefit above the long term public good. It is time for the PUC to act on its fundamental mission, which is to regulate utilities in Idaho. When doing so, the numerous studies, both academic and private sector, that address methods for quantifying the value of distributed solar should be the starting point. It is of great concern that conducting a fair and balanced study has been left up to interveners and the community to push for, instead of being the agreed upon foundation of this cost/benefit study. Many of the interveners have made recommendations for methods of quantifying the benefits of customer owned, distributed, renewable generation. I and other members of the community can supply both commission and staff with literature reviews if the great variety of publicly available information is not being used as the basis for study design.

Thank you for your work,  
Alex Mckinley  
1407 E. Jefferson  
Boise, Idaho 83712  
Idaho Power Customer

**From:** [William Fowkes](#)  
**To:** [Jan Noriyuki](#)  
**Subject:** IPC-E-21-21  
**Date:** Tuesday, November 30, 2021 10:33:36 PM

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I fully support net metering in Idaho. I have installed 18 solar panels at my home in Boise. The most responsible thing I have done decades.

I am an Idaho Power customer, the address is 4001 West Clement Road Boise Idaho 83704  
William Fowkes  
2089723901



**From:** [Jessica Cabral](#)  
**To:** [Jan Noriyuki](#)  
**Subject:** Move toward a brighter future! Case Number: IPC-E-21-21.  
**Date:** Tuesday, November 30, 2021 10:45:52 PM

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Dear Idaho Public Utilities Commission Commission Secretary,

I want the rooftop solar valuation study to be fair so I can participate in the program and help move Idaho towards a clean energy future! We must work together to ensure local, clean, customer-owned power is an option for all Idahoans.

Regards,  
Jessica Cabral  
2759 S Creek Pointe Ln  
Eagle, ID 83616

**From:** [Joel Stark](#)  
**To:** [Jan Noriyuki](#)  
**Subject:** IPC-E-21-21  
**Date:** Tuesday, November 30, 2021 10:45:56 PM

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Hi, I tried submitting comment on  
[Idaho Public Utilities Commission](#) but the comment section wouldn't accept my  
case number

here is my comment on Solar power possible changes:

A change to net metering could affect me by continuing to raise pricing making the use of Solar unaffordable. And it's important to offset our usage and be compensated fairly for power we send back to the grid.

If you need more than 25 KW of solar to meet those needs, an expansion to the limit of residential solar could help users.

A study on net metering should be conducted as such:

The study should be conducted by a third-party that is non-biased, not Idaho Power. The study should consider not only the impacts solar has on the grid, but also how it benefits the grid by adding resiliency and diversification.

thank you for the opportunity to comment

Joel Stark

**From:** [Jeffrey Woodworth](#)  
**To:** [Jan Noriyuki](#); [Jan Noriyuki](#)  
**Subject:** Comments for IPC-E-21-21  
**Date:** Tuesday, November 30, 2021 10:53:08 PM

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Dear Secretary of the Idaho Public Utilities Commission:

The case comment form is cutting off my comments, so please submit the below comments:

Case Number: IPC-E-21-21  
First Name: Jeffrey  
Last Name: Woodworth  
Address: 2522 E Plateau Dr.  
City: Boise  
State: ID  
Zip: 83712  
Daytime Phone: 208-333-4564  
Email: [jcw48@cornell.edu](mailto:jcw48@cornell.edu)  
Utility Company: Idaho Power

Comment:

My goal in commenting is to encourage the Idaho Public Utilities Commission to adopt rules that incentivize good behavior and disincentivize bad behavior by solar and other customers. In the instant case, the Commission appears to be planning to lock in a framework that will be used to determine the export credit rate for solar customers. Accordingly, the Commission in this case should choose a framework that will allow it to properly structure the incentives. While there has been improvement from the framework of IPC-E-18-15, the currently proposed framework still fails to incentivize good behavior in a number of instances and should be restructured.

For context, I am a solar customer grandfathered under the final order in IPC-E-18-15. I do not currently own a solar battery, an electric car, nor power quality equipment. (By “power quality equipment,” I am referring to equipment that removes harmonics or noise from exported power, provides reactive power, or fixes similar such issues with exported solar power.) I would consider purchasing a solar battery or power quality equipment to help the power system if Idaho Power compensated for the benefits to the grid. I will likely buy an electric car as my next vehicle, and I would consider using it to provide power to the grid at times of peak demand if the technology and incentives exist to do so.

### **Problems with Avoided Cost Methodology**

The existing proposal uses an avoided cost methodology. As I noted in IPC-E-18-15:

*The purpose of the DSM avoided cost framework is to allow a utility company to determine how to best invest money. As the name suggests, the DSM avoided cost framework involves determining the amount of cost avoided by various demand-side interventions. The utility company can then determine how best to allocate their resources by comparing the cost avoided to the cost of the various interventions. This purpose does not suggest it is an appropriate framework for determining rate structures.*

Solar customers exist in a monopsony and monopoly relationship with Idaho Power and suffer from an information imbalance with Idaho Power. The study seeks to quantify every cost avoided and use this to determine the export rate. This requires

proving a negative and any error works against the solar customer. The study should instead quantify the benefits provided by the solar export, quantify the actual cost incurred by Idaho Power handling solar exports, and subtract the costs from the benefits. Note that Idaho Power receives full price compensation from a solar owner's neighbors for exported solar power with no capital outlay and minimal usage of the grid. Idaho Power can also sell renewable energy credits to receive additional income for the exported energy, and the exported energy helps Idaho Power meet its net-zero pledge, which clearly has a business value to Idaho Power. Idaho Power should be required to quantify what costs are incurred by Idaho Power in this situation and deserve to be charged to solar customers to offset the many easily quantifiable benefits. Costs related to solar customers consuming during times of peak demand or low supply should be incorporated into the rate charged to solar customers for consuming electricity, and the study should explicitly consider how to structure the rate charged to solar customers (and/or other customers) for energy consumption in conjunction with the export credit rate rather than trying to quantify every issue in the calculation of the export credit rate.

One important benefit of this reframing is that it requires a proper accounting of how to divide up costs of issues like the duck curve. The duck curve is a problem of peak demand and peak supply being misaligned. Part of this problem lies with solar energy not aligning with demand patterns, but part of the problem also lies with the demand side using energy when it is not most prevalent. Any methodology that holds solar providers solely responsible for the costs of providing peaking power will not properly incentivize solar adoption and also not properly disincentivize the use of power during times of peak demand. The study should be required to propose how much of the costs of peaking power should be charged to demand customers and how much, if any, to solar customers. (Solar customers can be charged for the costs of peaking power by adjusting the rate charged to solar customers for energy consumption rather than adjusting the export credit rate.)

### **Form of Credit**

The staff argues that the export credit rate should be a price-per-kWh credit and not a kWh credit. The price-per-kWh credit would vary based on the time of day. While I would support instantaneous net metering and even dynamic pricing that varies based on experienced conditions as the best way to incentivize good behavior, it will create subsidies among classes if only solar customers are subject to such a system. Solar customers would bear the full brunt of the demand-supply mismatch while other customers would get to pay the same price for energy when it is plentiful and cheap as they would when it is scarce and expensive. The other customers are subsidized in their purchase of energy at times when it is expensive, and there is no incentive for them to reduce consumption at times of peak demand. The study should quantify the subsidy from solar customers to other customers when a price-per-kWh regime is used for the export credit rate (e.g., the price varies throughout the day), but the import rate charged to other customers is constant throughout the day. Alternatively, the study should consider how to set the export credit rate in a regime in which other customers are charged for consumption at rates that vary based on the time of day and prevalence of energy.

### **Firm vs. Non-Firm Power**

I very much agree with comments from the staff that the study should consider the impact of batteries. The export credit rate should be designed to incentivize battery usage and to smooth the duck curve. My concern is that the staff seemed to be suggesting that solar customers would be classified as firm or non-firm with firm customers receiving a fixed, higher rate and non-firm customers receiving a fixed, lower rate. Such a cliff edge would not optimally incentivize the delivery of power to the grid when it is most needed. It would be better to use

pricing to encourage delivery of power when it is needed. For example, electric vehicles are unlikely to be a source of firm power because they may not always be connected to the grid. Nonetheless, it would be good to properly compensate and incentivize customers having non-firm sources of power, such as electric vehicles, to deliver energy to the grid when it is most needed. The study should consider whether incentivizing delivery of energy at the right times through variable pricing mitigates the need for a discount due to lack of firmness. The study should also consider what technology is available to assist with firmness (e.g., technology to communicate how much energy is available from storage systems and/or to allow for communication to energy storage systems of dynamic pricing or requests from Idaho Power for the energy). The study should consider whether pricing incentives and/or technology can resolve firmness issues in the aggregate.

### **Power Quality**

Little has been said regarding the issue of power quality. Like with batteries, power quality equipment provides additional benefits to the system and allows Idaho Power to avoid installing power quality equipment. The study should consider the costs imposed due to poor power quality and whether different rates should be charged to customers with power quality equipment versus those without. (It is not clear whether it would be more efficient for Idaho Power to pay for installing power quality equipment or solar customers, but setting a rate would make it clear who can most efficiently bear this burden. It would also incentivize good behavior by solar customers if they can most easily bear the burden.)

### **Final Notes**

Solar and battery costs continue to fall while the world continues to get more serious about reducing carbon emissions. This creates a perilous situation in which we must get the economics and incentives right to maintain a healthy grid. If the result of the study and eventual rate setting is that solar customers are inadequately compensated and forced to subsidize the bad behavior of other customers, it will encourage solar customers to choose systems that allow them to go off the grid. Idaho power will end up with a shrinking customer base just as it needs that base to fund decarbonization effort. This could create a death spiral dynamic in which higher costs cause more customers to flee the grid, which further raises costs on the remaining customers, who may be least able to bear the cost. The Commission should select a study framework that ensures solar customers are adequately compensated and are only charged for the actual costs imposed on the company (plus a reasonable profit) and that properly incentivizes increased supply and decreased demand at times of peak demand.

**From:** [PUCWeb Notification](#)  
**To:** [Jan Noriyuki](#)  
**Subject:** Notice: A comment was submitted to PUCWeb  
**Date:** Wednesday, December 1, 2021 8:00:10 AM

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The following comment was submitted via PUCWeb:

Name: Vanesa Perkins  
Submission Time: Dec 1 2021 7:19AM  
Email: vnbrdnes@hotmail.com  
Telephone: 208-695-4759  
Address: 3150 S Mystic Seaport Ave  
Nampa, ID 83686

Name of Utility Company: Idaho power

Case ID: IPC-E-21-21

Comment: "My name is Vanesa Perkins and I am an Idaho Power customer living in Nampa. I am a long time resident of Nampa. My husband and I have 3 kids together and have raised our children in the Nampa area. We enjoy the outdoors and during winters enjoy having movie night at the house every weekend! My husband and I travel to Boise for work and it is amazing to see the increase in people and traffic in our area. I care about supporting fair solar options for Idaho customers because we have thought about going solar but had a really hard time making a decision due to net metering and if it will be worth it. We want to make sure that we are doing our part for the environment and others with helping the power grid. We want to ensure that those that are helping are fairly compensated for their efforts and long term costs associated with solar. Solar has made a huge impact on sustainability. Idaho Power was probably not predicting to have an increase of people moving to the valley at an unusually high rate so it is presumed that our grid is not currently able to handle the load without help. It is vital to make sure those that are doing their part to help the grid is treated fairly for their efforts to help Idaho Power and the grid in the valley. Please direct Idaho Power to conduct a fully comprehensive study of solar so that customers can be fairly compensated for all the value they're providing to our environment, economy, and families. This study should be conducted publicly and transparently by a non-biased third-party and evaluate the sustainability, efficiency and resilience that solar adds to the grid."

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**From:** [Fred Reed](#)  
**To:** [Jan Noriyuki](#)  
**Subject:** IPC-E-21-21  
**Date:** Wednesday, December 1, 2021 10:07:29 AM

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Dear Idaho PUC Secretary,

I am writing to express my desire that the PUC mandate Idaho Power offer a net metering pricing that provides a fair and reasonable incentive for customers to invest in distributed solar systems.

The urgency of getting to 100% clean energy is getting more obvious by the day. The public should be encouraged to join in and contribute to Idaho Power's 100% clean energy goal - and hopefully accelerate its achievement (2045 is almost a quarter of a century away!). In addition, local clean energy systems provide important grid security and energy independence.

Fred Reed  
410 E Old Saybrook Dr  
Boise, Idaho 83706

**From:** [Cameron Wagner](#)  
**To:** [Jan Noriyuki](#)  
**Subject:** Case # IPC-E-21-21  
**Date:** Wednesday, December 1, 2021 1:32:52 PM

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Cameron Wagner  
4198 Spring House Drive  
Eagle, ID 83616

Dear Commission Secretary,

I am an Idaho Power customer and I want clean energy choices that will make it financially practical to go solar. I call on the Idaho Public Utilities Commission to ensure solar has a fair market valuation. This would help all Idahoans by creating resilient local grid systems, reducing transmission line impacts on wildfires and wildlife ecosystems, growing the clean energy economy, creating good-paying local jobs, and helping Idaho Power meet its 100% clean energy goals.



**From:** [PUCWeb Notification](#)  
**To:** [Jan Noriyuki](#)  
**Subject:** Notice: A comment was submitted to PUCWeb  
**Date:** Tuesday, November 30, 2021 5:00:05 PM

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The following comments were submitted via PUCWeb:

Name: Bradley Smith  
Submission Time: Nov 30 2021 4:43PM  
Email: bradsmith5859@gmail.com  
Telephone: 970-618-6941  
Address: 2983 N Tattenham Ave  
Boise, ID 83713

Name of Utility Company: Idaho Power

Case ID: IPC-E-21-21

Comment: "I have been a student of electrical power for over 60 years. I hold a degree in Photovoltaics, am a licensed Electrician, certified electric car mechanic, and a 35 year veteran of the entertainment industry as a stage electric, and special events power engineer. I am also a remodel contractor, and am heavily engaged in updating the electrical backbone, and systems in residences in the state of Idaho. We are also the owners and drivers of two electric cars, and we install charging systems for electric cars. To put it succinctly, the local grid, and regional grids in the state of Idaho cannot support the conversion to electric heat pump heating systems, demand hot water systems, and the charging of electric vehicles. When you factor in the summer afternoon demands of air conditioning houses and business, commercial buildings, you have a perfect storm brewing. Local, community and microgrid PV energy systems and storage are a necessity of the grid of the near future, or we face massive shortages, and huge infrastructure improvement projects for the next few decades. Don't take my word for it, just do the math. When properly weighted by the costs of the upgrades that would be required to use the grid essentially one way, the value of local, end of line solar becomes clearer. An hour by hour, minute by minute valuation of electrical power is easy to get started, and once those rates are established, a valuation of the costs of maintaining the grid and the operating costs of the electric utility can also be established. There are plenty of outside consultancy think tanks such as the Rocky Mountain Institute that can assist utilities with the math of these projections. Only by establishing value at time of use and generation, can we get the rates for generation matched up with the rate of the demands. Local, community, microgrid and personal rooftop solar is a critical component to make the grid stronger, more resilient, and more reliable. Let's get the math, the rates based on true value and costs right, and build the grid of the future, together. Sincerely, Bradley Hillock Smith Proud resident of the great state of Idaho "

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Name: Mary Hunter  
Submission Time: Nov 30 2021 4:49PM  
Email: dogsaflying@gmail.com  
Telephone: 208-841-7119  
Address: 173 N Sierra View Way

Eagle, ID 83616

Name of Utility Company: Idaho Power

Case ID: IPC-E-21-21

Comment: "I am writing to ask the IPUC to move toward a future where people can reduce their carbon footprint by installing solar panels. It is ridiculous that the power from the sun is not being utilized to generate the electricity we all need. I am not on top of the proposed study that Idaho Power is trying to do but ask you to move toward a future including more solar, and wind power while reducing demand for hydrolic power and coal. Water is becoming more scarce but there is plenty of sun and wind. As a society, we need to work in the direction of using clean energy and Idaho Power can play a role in that by managing the system while as many of us as possible can be generating the power that Idaho Power can then distribute as needed. I make more electricity than I use and Idaho Power gets to sell it to others. Let us continue to build in that direction as a society. Thank you. Mary Hunter"

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Name: Laurie Zuckerman  
Submission Time: Nov 30 2021 4:21PM  
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-21-21

Comment: "I would like the PUC to create a strong incentive program for distributed solar because our summers will continue to have periods of intense heat. Homes and businesses need to be able to help provide power during these high-usage times. It's no longer a luxury; it's critical for survival and economic growth. "

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**From:** [PUCWeb Notification](#)  
**To:** [Jan Noriyuki](#)  
**Subject:** Notice: A comment was submitted to PUCWeb  
**Date:** Wednesday, December 1, 2021 7:00:08 AM

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The following comments were submitted via PUCWeb:

Name: Charles Gains  
Submission Time: Nov 30 2021 7:36PM  
Email: [crgains@msn.com](mailto:crgains@msn.com)  
Telephone: 208-830-3787  
Address: 1721 E. Canova Dr.  
Boise, ID 83706

Name of Utility Company: self or individual

Case ID: IPC-E-21-21

Comment: "As a home owner and supporter of clean, safe, renewable, solar energy generation I want to comment on the solar energy case before the PUC. This includes the totality of the energy needs within the IPCO service area. This geographic area is unique in that the major power source of energy has been hydro-generated power, a natural resource of this region. IPCO has had a monopoly of this natural resource. IPCO has enjoyed exclusively charging for dam licensing, power harvesting, power generating, power wheeling, and distribution to its customers within its geographic service area. In return for its firm delivery of power IPCO has enjoyed guaranteed returns on its investments and profits. Enter the advent of solar generated power. The IPUC, not the IPCO, seeing the potential and the need for alternative, renewable, clean energy promoted the concepts of solar energy through its net-metering program. At that same time solar was seen as an answer to reduction of "peak demands" at the time in the annual hydro power generating cycle (in late summer when irrigation power was in high demand and generating capabilities was waning). Today, we are again engaged in an argument of who controls, is entitled to, and "owns" the power generating resource – The SUN. The same complicated arguments about costs and ROI that IPCO has made in the past are now being made by the individuals investing in their own solar exploits. IPCO has devised policy and made lop-sided arguments that it is entitled to returns on solar generation investments that individuals spend. The only way to settle this dispute is to make study (Solar Study) of the facts, operations, costs, etc. involving the same power elements IPCO has enjoyed in development of its hydro-power i.e., licensing, power harvesting, power generating, power wheeling, and distribution. Charles Gains Boise, "

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Name: Jesse Simpson  
Submission Time: Nov 30 2021 5:20PM  
Email: [uncle.jessee@gmail.com](mailto:uncle.jessee@gmail.com)  
Telephone: 208-501-5417  
Address: 2708 S Inverness Way  
Boise, ID 83705

Name of Utility Company: Idaho Power

Case ID: IPC-E-21-21

Comment: "Dear IPUC, I have been involved in rate cases involving customer generation over the past 8 years and have experienced Idaho Power's attempt to degrade the adoption rate of privately owned renewable energy year after year. We appreciate the decisions made on prior cases and in 2019 to protect Idahoans. We welcome a fair and thorough study so that the purgatory period of solar investment comes to an end. I request this study include how much money private Idahoans have invested into renewable power generation since December 2019 and evaluate increased capacity to the grid this has brought to the State. How much money would Idaho Power have had to spend and pass onto rate payers for similar renewable generation capacity. The private sector has taken this burden and in turn they are rewarded with owning the power they produce. It is clear that Idaho Power wants to reverse this opportunity to protect profits and share holders. Thanks for overseeing a fair study to protect Idahoans and to allow for fair customer generation policy going forward. "

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Name: Malcolm Wilson  
Submission Time: Nov 30 2021 9:12PM  
Email: mwilsonna@gmail.com  
Telephone: 801-652-3866  
Address: 563 East Fork Road  
Hailey, ID 83333

Name of Utility Company: Idaho Power

Case ID: IPC-E-21-21

Comment: "My name is Malcolm Wilson and I am an Idaho Power customer (account No.s 2225530407 and 2225530472) living in Hailey, Idaho. I recently retired from the Bureau of Reclamation as a Water Resource Manager and purchased a retirement home near our grandson in Triumph outside of Hailey which I am working on restoring. My wife works at a hospital where they see significant numbers of cases of pulmonary diseases due to air quality. As a result of my work with Reclamation, I am very aware of the impacts that climate change is having on our runoff and resulting hydropower production in the West. I am also very aware of the effects of burning fossil fuels in contributing to climate change and the resulting effects upon our air quality and its contribution to poor health. I care about supporting fair solar options for Idaho customers because I believe that we as individuals, businesses and society need to make concerted efforts to move away from fossil fuel sources of electricity to reduce climate change for our health, for our children's health and future and for the planet, even if it costs individuals and businesses more up front. I would like to install solar power panels for those reasons. Central Idaho is a prime place for the development of solar energy. Even with net metering however, It will be a significant personal investment to install solar on our home. The cheaper approach for me would be to just continue to rely solely on commercially produced power from the grid. I believe that companies such as Idaho Power can, and should step up and make their contribution by making options such as net metering available to their customers. I believe it is in the interest of Idaho and its citizens for the Public Utilities Commission to conduct a non-biased, third-party and transparent study considering the full benefits of net metering and costs (health, contribution to climate change, etc.) of relying on fossil fuel power production. Please direct Idaho Power to conduct a fully comprehensive

study of solar so that customers can be fairly compensated for all the value they're providing to our environment, economy, and families. This study should be conducted publicly and transparently by a non-biased third-party and evaluate the sustainability, efficiency and resilience that solar adds to the grid. Thank You Sincerely Malcolm Wilson "

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Name: Mary Anne Saunders  
Submission Time: Nov 30 2021 9:45PM  
Email: Saundersstar@aol.com  
Telephone: 208-870-4532  
Address: 2230 Schreiner Lane  
Star, ID 83669

Name of Utility Company: Idaho Power

Case ID: IPC-E-21-21

Comment: "It is with dismay that I learned of the proposal to essentially delete net zero for home solar installations and put in its place a pittance credit. That you would give such a plan serious consideration flies in the face of our planet's desperate need to address global warming. I actually thought you saw the critical need to leave an intact planet for our grandchildren. We must have public policy that encourages expansion of crucial alternative energy. This proposal changing the formula discourages such expansion. Further, it will seriously penalize those who already have installed solar panels. The implications of your decision on this matter are substantial - do you support alternative energy development at all levels or do you not? Making this change will defeat such development.. I had carefully considered installation of solar panels on my home this past year.. As currently structured, the incentives' costs are high yet the payback is considerable for the environment. If you approve this change it will bring a halt to solar conversion by homeowners in our state and eliminate the benefits of homeowner participation.. ."

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Name: Burton Smith  
Submission Time: Nov 30 2021 9:33PM  
Email: brsmithintf@yahoo.com  
Telephone: 208-308-3535  
Address: 2651 E 4000 N  
Twin Falls, ID 83301

Name of Utility Company: Idaho Power

Case ID: IPC-E-21-21

Comment: "Honorable PUC Commissioners, I am a proponent of home solar electricity generation. I want to see a continued strong incentive program in place for this type of distributed power. It only makes sense that we take advantage of the footprints on the land that we have already created, our homes. With strong incentive programs, more homeowners will be motivated to become part of the solution to our climate change woes by installing clean

solar energy generation. The study that will be undertaken by Idaho Power needs to be done fairly and with complete transparency. If this is done I am certain that the conclusion will be one that continues to provide an incentive to homeowners and is fair to Idaho Power. With more homeowners participating in solar generation, we all benefit by way of less carbon dioxide emissions, cleaner air, less mining for coal and natural gas, and we take advantage of using the footprints on the land we have already created from the placement of the houses. With more household solar generation, electricity can flow from house to house, business to business, thus fewer transmission lines will be needed because the amount of centralized electricity generation will be reduced. This will create more efficient transport of electricity as the current loss of electricity due to resistance will be reduced. I have enjoyed generating solar power on my rooftop since 2015. I would like to expand my array so when I purchase an EV vehicle I can use the sun to power my car. How exciting if all can do this. As we look to the future, EV vehicles will be the norm; homeowners should be incentivized to be able to use rooftop solar to charge their cars of the future and their home as well. Please seriously consider my comments as you make your decisions about the equity of rooftop solar generation. Increased rooftop solar is good for our economy, it is good for energy independence, it is good for the creation of jobs, it is great for our environment. All of these things are in the best interest of our citizenry. Thank you. Burton Smith "

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Name: Carol Ogburn  
Submission Time: Nov 30 2021 9:02PM  
Email: cjogburn22@gmail.com  
Telephone: 804-382-2121  
Address: 4261 E Vacheron St  
Meridian, ID 83642

Name of Utility Company: Idaho Power

Case ID: IPC-E-21-21

Comment: "I strongly support the PUC proposed cost/benefit analysis related to customer and solar power usage. PUC's analysis would give a clear transparency and accountability public interest message . I further promote the ENCOURAGEMENT OF SOLAR POWER : 1. it is a natural for the Idaho climate/ 2. solar energy is a win/win for both Idaho Power and the customer - both contributing to the control of climate change/ i.e. saving the planet and future generations/ 3. solar energy is needed for the increase use of electric energy - electric cars and the reduction in fossil fuels/ 4. buying back extra solar from customers is a second win/win - Idaho Power shows respect for customer-the planet-and its own conscious future-thinking business practice and Idaho Power gets energy it doesn't have to create."

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Name: Alyson Martin  
Submission Time: Nov 30 2021 11:16PM  
Email: musical52@hotmail.com  
Telephone: 208-484-3241  
Address: 3716 E Timbersaw Dr  
Boise, ID 83716

Name of Utility Company: Idaho Power Company

Case ID: IPC-E-21-21

Comment: "Climate change can no longer be denied or ignored. Our atmosphere is being altered by greenhouse gas emissions which will remain there for generations. I bought my residential solar array solely reduce my GHG emissions in an effort to do my small part to address the climate crisis. It is imperative that Idaho Power and the IPUC recognize the urgency of this crisis and take all steps possible to reduce GHG emissions. This crisis threatens the existence of all life on Earth. Please face this reality and think of our children and their children in your decision-making. Profits will be of little consolation when the Earth is no longer livable."

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Name: Theresa Kaufmann  
Submission Time: Nov 30 2021 10:16PM  
Email: tmrkauf48@gmail.com  
Telephone: 208-252-4464  
Address: 4977 Clearview Ave  
Pocatello, ID 83204

Name of Utility Company: Idaho Power

Case ID: IPC-E-21-21

Comment: "I am a homeowner in Pocatello and had rooftop solar panels installed in the summer of 2019. I did this as one way to address the critical issue of climate change and a way to assist Idaho Power realize their clean energy goal for 2045. It benefits the community in many other ways by creating jobs, economic activity and health improvements. I am urging the IPUC to conduct a solar study that is fair and credible and that takes into account all the benefits and aspects of power generation. This should include an equitable and predictable rate structure that will allow all to participate in their own power generation. Citizens also need transparency and access to information that will help them make good decisions about participating in their own power generation. Thank you for your consideration."

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Name: Charles Gains  
Submission Time: Nov 30 2021 9:48PM  
Email: crgains@msn.com  
Telephone: 208-830-3787  
Address: 1721 E. Canova Drive  
Boise, ID 83706

Name of Utility Company: Idaho Power

Case ID: IPC-E-21-21

Comment: "SOLAR POWER STUDY AND SURVEY QUESTIONS: • What are the existing

Solar Power policies and practices of IPCO, the IPUC, and private Solar Generators been to date? o What are the elements (permitting, contracting, roles and responsibilities, operating conditions and responsibilities, uses and distribution of solar power, etc.)? What happens to existing solar installation agreements (e.g. net metering) if the solar system is repaired with system upgrades or new technologies before any contract rights expire? E.g. would putting in or replacing a new technology inverter in an existing system void the net-metering grandfathered agreement? o What are the costs, benefits, demand, needs, relevant uses/consumption/delivery/ regulatory compliance/laws, and impacts e.g., climate, IPCO, etc? o What are other PUCs, States, Power Companies, Public entities, and general population programs doing about solar power design, generation, distribution, policy, around the nation/world? o What are the existing laws regarding solar power rights and regulation in this region and others? • Who owns and has the rights to solar power i.e. who is entitled to the design, generation, limits, operation of, use of, distribution of, and future of solar generated power? o What are the differences between large-scale, single-point-power generation and distribution of existing plant systems vs. solar generation? o What are the needs of the end-users (customers)? What are the projected chronological generating abilities and demands of customers in this and other service regions, e.g., MWH generating and demands vs. timed operating system cycles? • What is an equitable rate balance when IPCO wants to charge customers for generation vs. when solar generators create storable generation capacity for IPCO? o If IPCO saves \$1 in avoided cost due to solar generation, should it return that \$1 to the customer? o If a solar generator supplants the need for IPCO to generate power at high reservoir capacity time of year and IPCO can save that capacity until August (a low reservoir capacity time of year) should IPCO rebate that actual cost of generation to the solar generator? o If solar generators negate need for long-distance wheeling costs, step up and step down and line-loss transmission costs, should IPCO rebate those actual avoided costs to the solar generator? o If solar generators produce excess power during high-demand periods and IPCO sells that power to nearby customers should IPCO rebate the higher KWH sales rate to the solar customer? o Should solar generators be entitled to ROI when returning power to the IPCO grid? • Should solar generators be entitled to operate their own systems regardless of whether IPCO is delivering power? o Technology now exists for solar generators to use solar power when the power grid is inactive, but current switching does not allow this to happen unless the solar system is not an IPCO customer. Is this equitable? o Under what conditions should the solar generator be allowed to operate independent from the IPCO grid? o Should there be a limit to the size of system solar generators can operate? o Should there be a limit to the size of storage a solar generator is allowed to install? • What is the value to supplanting IPCO coal-fired generation with solar generation? o Should reducing CO2 emissions be embedded in the IPCO rate as an avoided cost? o Should imputed coal-fired generation cleanup costs be included as an avoided cost due to solar generation? • Should governmental agencies enjoy the same net-metering benefits as small solar generators? o Cities, counties, school districts, State agencies, Parks, Universities, etc. could reduce taxes if they could lower their power bills. Should IPCO give the same rebates to these agencies as other small-scale solar generators? o Should cities, counties, school districts, State agencies, Parks, Universities, etc. have the right to choose whether it wants to use IPCO power or its own solar power generation? • Should businesses enjoy the same net-metering benefits as small solar generators? o Ditto the above supplementary questions. • Would promotion of a solar generation industry bring new jobs, technology, businesses to the Idaho economy? "

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Name: Frederick Belzer



Submission Time: Nov 30 2021 8:17PM  
Email: belzerfred@gmail.com  
Telephone: 208-241-1239  
Address: 4977 Clearview Ave  
POCATELLO, ID 83204

Name of Utility Company: Idaho Power

Case ID: IPC-E-21-21

Comment: "Re: Idaho Power Solar Case Study I am a Pocatello homeowner with rooftop solar panels since 2019 and I participate in net metering. I urge that this study be undertaken by an independent entity rather than the regulated business. I am interested in expanding my rooftop solar panels but I am concerned that I will not be treated fairly by Idaho Power in setting the net metering rate by considering the full range of costs to the homeowner and benefits to Idaho Power and the public of home generation of clean renewable energy. "

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Name: Daniel Hartigan  
Submission Time: Nov 30 2021 6:20PM  
Email: ratf15e@gmail.com  
Telephone: 208-275-9901  
Address: 267 e schmeizer Ln  
Boise, ID 83706

Name of Utility Company: Idaho Power

Case ID: IPC-E-21-21

Comment: "Dear Commission, I'm writing in regards to the upcoming Idaho Power study of on-site generation. I am an Idaho Power customer. I am intending to purchase solar and storage before the completion of the study process. I have several thoughts on the process. First, as it seems clear that Idaho Power will be conducting the study, an independent audit conducted by a reputable knowledgeable group should follow. The review should not be left to strictly public comment. I know I certainly do not possess the experience or expertise to perform such a task. Second, on-site generation is broader than solar. The study should fairly and equitably include all types of on-site generation and grid supply including storage. When considering on-site generation we should be forward looking to new technologies such as Electric Vehicle battery grid tie or any other soon available capabilities. I would encourage the Commission to avoid making this just a solar study. Third, keep aware in this process that other regions of the country have not only chosen to maintain net metering but added incentives from the utility company to their customers for installing clean energy production. It seems likely Idaho Power could encourage on-site clean energy production through policy and still meet their financial needs. Finally, as I read Idaho Power's proposal and listened to their online public workshop, one recurring thought was I wish I could drop these guys and get a new power company. It turns out, at least in Idaho, I can't. Since we're all in this together, let's make it equitable for all. Regards, Daniel Hartigan"

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Name: Patti Raino  
Submission Time: Nov 30 2021 8:27PM  
Email: pattiraino@yahoo.com  
Telephone: 208-336-2280  
Address: 4905 W Outlook Ave  
Boise, ID 83703

Name of Utility Company: Idaho Power

Case ID: IPC-E-21-22

Comment: "My name is Patti Raino and I am an Idaho Power customer living in Boise. I am retired, raised two children in Idaho and love my state and have concerns about climate change impacting my family. I care about supporting fair solar options for Idaho customers because it is important to use encourage and use solar generation to help mitigate the impact of climate change. I installed solar in my home this past year and find it exciting to think that I am making an impact clean air. I would like to see more of my neighbors use solar and it's cost effectiveness through net metering is important in increasing it's usage. Please make sure the Idaho Power study on net metering looks at the importance of growing and sustaining solar on Idaho homes and businesses. "

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