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To: [Jan Noriyuki](#)
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Subject: Comment letter Re: Case No. IPC-E-22-12
Date: Monday, May 9, 2022 8:25:39 AM
Attachments: [PUC letter 05092022.pdf](#)

Dear Ms. Noriyuki, please see our comment letter dated May 7, 2022 regarding Case No. IPC-E-22-12.

Best Regards

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May 7, 2022

Jan Noriyuki, Secretary
Idaho Public Utilities Commission
11331 W. Chinden Blvd., Building 8, Suite 201-A
Boise, Idaho 83714

Re: Case No. IPC-E-22-12 - In The Matter of: Clean Energy Opportunities For Idaho's Petition For An Order To Modify The Schedule 84 100kW Cap & To Establish A Transition Guideline For Changes To Schedule 84 Export Credit Compensation Values

Dear Ms. Noriyuki

We write you in support of Clean Energy Opportunities For Idaho's petition for an Order to Modify the Schedule 84 – 100kW Cap, and to establish a transition guideline for changes to Schedule 84 Export credit compensation values.

For an introduction, we represent three farming interest and a water delivery company named Maurice H. Eckert & Son's, Inc., Magic Irrigators, Inc., M & R Farms, Inc. and Magic Water Company, Inc. In total these combined entities use approximately 19 million kilowatts of electricity with an effective cost per kilowatt approximating \$.075/kilowatt. Its high month demand (kW) approximates 6,300.

As the Commission is well aware, agriculture is facing a huge power increase this year with a 9% power cost adjustment increase just by itself along with normal rate increases and combing those costs with normal operating costs of diesel, supplies & repairs, fertilizer, chemicals, and what not which makes farming more and more difficult.

There seems to be an inherent and continuing bias by Idaho Power and by the Commission when it comes to allowing irrigators, particularly those operating high lift pumping stations along the Snake River basin, to participate in net metering and self-generating facilities.

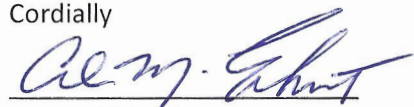
We know that Idaho Power has recently announced a need for more generation next summer (2023). Farmers in general, can be part of the solution to this expected generation shortfall. They, however, need visibility on cap and export rate transition immediately and certainly no later by this fall of 2022, not 2024 as Idaho Power future schedules indicate.

There are certain comments made by Clean Energy Opportunities for Idaho that we would like to highlight and of course support: 1) "The Idaho Energy Plan states it is Idaho's policy to encourage investment in customer-owned generation"; 2) "The 100kW cap does not "encourage the cost-effective development of customer-owned renewable generation" – not even close; 3) "However, we are concerned that the Company's proposal is inconsistent with State policy as expressed in the Idaho Energy Plan, will discourage investment in distributed generation, and encourage rate-gaming"; and finally, 4) "The Department of Water Resources – Energy Division recommended that net metering be offered to Large General Service and to Irrigation customers, and if so that a much higher cap should be investigated for those customer". It further states "For.....aggregated loads could be high was 8,000 kW", as we have noted above in our own operations.

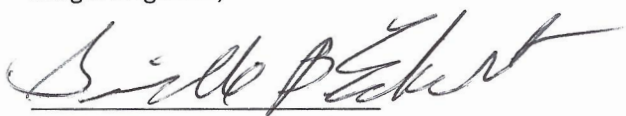
So, we encourage the Commission to change the rules from the 100 kW cap to 100% of the customer's maximum demand as the IPC-E-22-12 petition requests and which will greatly incentivize large farming & high lift pumping irrigation operations to invest their own capital into self-generating facilities, thus decreasing the overall load requirements of Idaho Power.

Finally, as we stated earlier in this letter, the Commission and Idaho Power have long discriminated against farming and irrigation interests when it comes to allowing those interests to invest in self-generating electrical facilities.

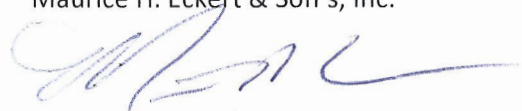
Cordially



Armand M. Eckert, Secretary
Magic Irrigators, Inc.



Granville B. Eckert, President
Maurice H. Eckert & Son's, Inc.



Mike B. Eckert, President
M & R Farms, Inc.



Ron P. Elkin, President
Magic Water Company, Inc.