

**From:** [PUCWeb Notification](#)  
**To:** [Jan Noriyuki](#)  
**Subject:** Notice: A comment was submitted to PUCWeb  
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The following comment was submitted via PUCWeb:

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Submission Time: Jun 29 2022 8:56PM  
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Name of Utility Company: Idaho Power

Case ID: IPC-E-22-12

Comment: "My name is Kevin King, and I have served as an expert witness and industry representative for ICEA in net metering dockets over the last decade. I believe the best use of my comments is to share a perspective and address some misunderstandings drawing from twenty years in the solar industry and a decade of participation in all related net metering dockets. 1. One could say, residential and small commercial rate payers "had their day in court,". I appreciated that the Commission stuck around until 2:15am in 2019 to hear public reaction to the 18-15 cost/benefit study. In response to that testimony and the 1000 public comments in that residential/small commercial docket, the Commission ordered a new process. However, CI&I customers have not been afforded the same opportunity. As a participant in both 18-15 and 19-15, I believe the Commission would have heard different testimony if agribusinesses had been given a similar opportunity to react to the terms agreed to but not filed in 19-15. Given that agribusinesses did not have the same chance to influence the process, I would hope the Commission sees the CEO petition as a well-founded and doable option that bridges interests. The CEO petition doesn't affect the process which the Commission has stressed is related to valuing exports, the CEO petition gives the Commission the chance to provide some relief to agribusinesses while not rushing the process for deliberating complicated rate/compensation issues. Idaho Power's request to dismiss that opportunity and deny agribusinesses fair access to solar in 2022 is a request to harm the financial well-being of customers who did not get a fair say in the process. 2. If the cap were integral to other matters in the study, Idaho Power would not have excluded the cap from its 18-15 and 19-15 applications to study the costs and benefits of net excess generation. The cap is the only matter in the study that is unrelated to rates / compensation. It is a design parameter that the Commission added to the study after it came up in deliberations on Idaho Power's applications to change other Schedule 84 configuration specifications. After the study had been re-ordered (2019) and before Idaho Power launched the second study (2021), they filed 20-26 as well as 20-30 to propose other net metering configuration changes; a boatload of commenters asked to also address the 100kW cap. The Commission acknowledged customer concerns with the 100kW cap but said the matter had not been noticed. When I read the CEO petition, it sounds like an effort to do what the rate payers have expressed concerns over and exactly what the Commission ordered - to revise the cap after the Company has thoroughly studied it and to meet the regulatory requirement of giving adequate notice. 3. Idaho Power's motion to dismiss seems to misunderstand the role of the 100kW cap. Tying the 100kW cap to

claims of cost shifting makes no sense given the current realities. Currently, irrigators installing solar are harmed by the added costs and design inefficiencies of installing numerous grid-tied 100kW projects at different meter sites rather than right-sized, right-placed projects to achieve the same capacity. If the aggregate capacity is the same, any claims that the 100kW limits cost shifting are baseless. 4. The Commission has appropriately stressed that installers and customers should assume rates can change, and ICEA worked to pass a law that requires installers to disclose that, which is now in place. In reality, disclosing that rates can change is not the same as modeling potential changes. Any analysis of a grid-tied investment in solar makes an assumption on the value of exports to the customer. Consider which is better: having an investment analysis based on current export credit rates and a disclosure in words about rates changing, or having an investment analysis in which the calculations can evaluate the sensitivity of the investment to changing export compensation rates using the Transition Guideline as an example (rather than an individual's best guess). Having a common point of reference better empowers customers to compare competitive bids and ensures that customers will recognize the risk of export rate changes in the manner that CI&I customers make decisions, which is grounded more in numbers than words. I really believe that if the Commission were fully aware of the unnecessary harm to agribusinesses resulting from current regulations, the Commission would welcome the chance offered by the CEO petition to do something about it. Please grant the CEO Petition."

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