

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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Name of Utility Company: Idaho Power

Case ID: IPC-E-22-12

Comment: "Since my prior comments, Idaho Power has completed its "Value of Distributed Energy Resources" study. After a thorough review of the VODER study, I wanted to point out that in regard to the cap, the CEO Petition seems more aligned with Commission orders than the VODER study. The VODER study excluded the cap from its workshop, does not reflect customer comments to the PUC regarding the cap, does not draw lessons from other states, or reference published best practices. The VODER evaluation of a modified cap amounts to a few pages of interconnection, distribution, and implementation matters. Idaho Power proposes to hold "technical workshops with Commission Staff, installers, and other interested stakeholders to discuss proposed tariff modifications" in 2023 (Grant Testimony). I support having those interactive technical workshops as soon as possible, in 2022, facilitated by staff. IPC-E-22-12 provides a better docket for those discussions so that this technical and solvable matter of modifying the 100kW cap can be implemented in fall 2022. I realize the CEO Petition was trying to support a cap which Idaho Power had proposed, and I could support that cap, though now Idaho Power seems to prefer a 2000kW cap (which is also reasonable and common). In its Order on the CEO Petition, I suggest that the Commission allow the technical workshops to also consider revising the cap to be set to an absolute level, either 2000kW, or a table of absolute cap levels for CI&I starting at 1000kW with specific protocols for each level."
