

July 19, 2022

Case ID: IPC-E-22-12

The Idaho Grain Producers Association (IGPA) appreciates the opportunity to provide brief comments on Case IPC-E-22-12. With over 600 wheat and barley farm families as members, IGPA is the key policy advocacy organization working on behalf of Idaho's grain industry with local, state, and federal leaders.

It is IGPA's longstanding policy that Idaho's farmers should be supported in their ability to participate in renewable energy opportunities. Accordingly, we request that the PUC give strong consideration to Clean Energy Opportunities' petition to both increase the eligibility cap for customer generation projects and to improve the predictability and stability of the export credit value.

The current 100kW cap on irrigator projects imposes unnecessary costs on farmers who want to invest in solar. Rather than being able to design, build, and connect a single site to match their consumption, farmers are instead required to build multiple, smaller sites in multiple locations – which is more expensive and less efficient for all parties involved. If a farmer is going to invest in solar generation, we would ask that they be able to install an appropriately sized project to offset their energy consumption.

IGPA noted in our 2020 letter to the PUC that, “the lack of clarity for the future of net metering for irrigators provides no sideboards for operators to gauge the risk and return of such projects.” This fact has been shown to have a profoundly negative impact on farmer investment in solar generation. Improving the predictability and stability of export compensation rates is critical for farmers. Providing growers with this much-needed transparency would support both irrigators' interests in offsetting their sizeable power costs and Idaho Power's need to supply energy to their customers, as well as supporting the company's stated goal of expanding their green-energy portfolio.

In closing, we ask that you give favorable consideration to Clean Energy Opportunities' petition.

Sincerely,

Lucas Spratling
President, Idaho Grain Producers Association

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

July 19, 2022

Re: Case # IPC-E-22-12, petition to modify the 100 kW limit on solar for farms and businesses

Dear Commissioners,

In October 2020, our organizations submitted a joint [comment](#) on IPC-E-20-26 with the following request:

“[W]e urge you to lift the arbitrary 100 kilowatt-per-meter cap on customer-owned solar installations that creates significant financial and logistical barriers for farmers and business owners who deserve the ability to invest in solar energy systems that are large enough to meet their energy needs.”

With the new case before you on this matter (IPC-E-22-12), we now re-submit this same request and urge you to a) not dismiss this petition and b) address this issue immediately and without delay.

We stand by our former [comments](#) about the critical importance of fair solar options for Idaho’s farmers and business owners.

Respectfully,

Climate Action Coalition of the Wood River Valley
Conservation Voters for Idaho
Idaho Organization of Resource Councils
Portneuf Resource Council
Snake River Alliance

New signatories:

Idaho Chapter Sierra Club
Idaho Sustainability and Energy Coalition