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Subject: Idaho Power Releases Study Taking Aim at Rooftop Solar
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Commissioners
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Re: Idaho Power Releases Study Taking Aim at Rooftop Solar

Dear Commissioners:

Idaho Power submitted its long-promised "Customer Generation Study" to the (IPUC) just over a week ago, continuing its efforts to reduce rooftop solar accessibility and affordability for its customers.

The study — which was conducted by Idaho Power itself, Idaho's largest for-profit monopoly utility corporation — shows that it is considering reducing the current export credit rate of 8-10 cents per kilowatt hour (the same rate that customers pay for power) to 2.8-4 cents per kilowatt hour, cutting the credit rooftop solar owners would receive for selling their energy back to the grid by over 60 percent.

It seems like Idaho Power wants to be the only one to benefit financially from Idaho's energy transition. If approved by the IPUC, this will take away opportunities for families, business owners, or farmers who want to produce their own renewable power to meet their energy needs and lower their energy costs.

In 2018, the IPUC ordered Idaho Power to "comprehensively study the costs and benefits of on-site generation on Idaho Power's system [...] and related issues of compensation for net excess energy provided as a resource to the Company." Idaho Power proposed drastically lowering the solar export price in 2019, triggering backlash from public and energy industry professionals. The IPUC rejected those rates and ordered Idaho Power once again to conduct "a credible and fair study on the costs and benefits of distributed on-site generation to the company's system." Idaho Power finally submitted the study on the last day of June, 2022.

The study notably fails to address environmental impacts and societal benefits of rooftop solar, despite previous promises to stakeholders as outlined in its IPUC-approved Study Framework. The study left the "avoided environmental costs" section virtually blank, claiming the utility can't include "non-quantifiable and speculative values."

Idaho Power was disingenuous in agreeing to quantify the environmental, public health, and local economic benefits of individual-owned solar—and then not doing so. By not including any of these critical metrics in its

study, its proposed export credit rates are far lower than they should be, and it disregards the very real and measurable contributions of solar owners in our communities in reducing pollution and creating green jobs.

Many are disappointed in the low value that Idaho Power has placed on customer-owned solar. If the utility's suggested values are accepted by the Commission, families and business owners will be functionally unable to take part in the financial and environmental benefits of solar.

Idaho has over 1,500 workers in the renewable industry, including 693 in solar, according to a 2021 Department of Energy analysis. Idaho conservation groups put out a statement earlier this year promoting community-owned solar, a vision of an alternative model of renewable energy development that's less reliant on for-profit, investor-owned utilities like Idaho Power and that results in more locally-based job creation and economic benefits.

The utility claims solar customers create "fairness" issues on the electric grid, pushing infrastructure and administration costs on to other customers. However, more clean energy production by customers means the utility doesn't have to build expensive new power plants and can avoid other costs, thereby keeping utility rates lower for all customers. Multiple independent studies confirm that there are net-positive economic benefits for all customers from rooftop solar, including recent studies in neighboring states of Wyoming and Utah.

Idaho Power should continue to buy energy from solar generators, like the customers, at the same rate they charge them, as there are just as many economic benefits to the utility and the power grid as there are impacts. Customers who add renewable energy to their home and participate in net metering help Idaho Power meet their own clean energy goals. Our customers personally invest in new generation sources that the utility and rate-payers don't have to support and the excess energy sent back to the grid helps to alleviate demand issues the utility faces.

If new rates are approved, customers who installed solar prior to December 2019 are able to maintain the current export credit rates over 25 years, but new customers would face the less affordable rate.

The IPUC will review Idaho Power's study and open it up for public comment in the coming months. A final decision on lowered export credit rates could be made by the end of the year.

Yours sincerely,
Robert E. Rutkowski

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Quotes

"Idaho Power should continue to buy energy from solar generators, like our customers, at the same rate they charge them, as there are just as many economic benefits to the utility and our power grid as there are impacts," said Josh Powell, CEO of Revolusun. "Customers who add renewable energy to their home and participate in net metering help Idaho Power meet their own clean energy goals. Our customers personally invest in new generation sources that the utility and rate-payers don't have to support and the excess energy sent back to the grid helps to alleviate demand issues the utility faces."

"When someone provides clean power back to the grid from their solar panels, they deserve to be adequately compensated by the utility," said Martha Bibb, a resident of Hailey who installed solar on her home. "I installed solar to help the environment, and I've not regretted that investment. Net metering [receiving an export credit rate equal to the retail rate] helped to defray the initial investment. I'm worried others won't get that opportunity now."