

**From:** [Donald Shaff](#)  
**To:** [Jan Noriyuki](#)  
**Subject:** Comments on IPC-E-22-22  
**Date:** Monday, September 19, 2022 2:12:01 PM  
**Attachments:** [Case IPC-E-22-22 Comments.docx](#)

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Ms. Noriyuki, you should find attached my Comments on the Subject Case in Word format. Thank for your added work to add my Comments to the Case record.

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Sent from [Mail](#) for Windows 10

Comments on IPC-E-22-22 of Donald V Shaff, 4552 N Foothill Drive, Boise ID 83703

September 19, 2022

The VODER Study stated IPCO's meters have the capability to measure on an hourly basis. The PUC could follow other utility rate basis to have tiers of rates incentivizing customers to use electricity for dishwashers, washing machines, hot water demands, and adjusting A/C temperatures requirements until off peak hours (e.g., 8 pm to 10 am). A higher Peak Hour use rate would incentivize reducing electricity outside those times. Recently IdaCorp using its subsidiary IPCO wheeled electricity through the regional intertie system to sell electric power to strained power companies in California and the Southwest where and when its citizens were under a Heat Advisory while IdaCorp on the backs of IPCO rate payers made a sizeable profit.

VODER Environmental Non-impacts: No Carbon Tax is a smoke screen. IPCO's non-EV fleet of vehicles for inspection and maintenance plus its sub-contractor's using non-EV vehicles all the combined emissions contribute to greenhouse effects exasperating global warming not to mention the emissions from IPCO's natural gas plants used for meeting peak load demands.

The Idaho Statesman 9/17/2022:

Cryptocurrency miners are flocking to Idaho for its cheap power. State authorities say the additional energy demand is placing a burden on the entire electrical grid. In fact, Idaho Power asked the Idaho Public Utilities Commission to create a new customer class for large-scale crypto miners, said Jordan Rodriguez, a spokesperson for Idaho Power. The new classification was approved in June, according to a PUC spokesperson, but a Puerto Rican crypto mining company called GeoBitmine requested reconsideration. The PUC is now taking comments on that petition.

"It's viewed as a low-risk location to carry out these operations," Rodriguez said. "It's also a relatively low-cost energy location as compared to operating in California." **Idaho Power is already experiencing an increase in demand thanks to substantial population growth over the last decade or so. Excessive heat and fire activity also puts a strain on the grid.** (Emphasis added.)

Power would shut off crypto mining during peak demand. One of two key parts of the utility's request to the PUC is the ability to shut off crypto-mining operations during times of peak energy demand to avoid any shutoffs for Idaho Power's remaining customer base. Heat waves are the best example of a time when its system is running near capacity, Rodriguez said. "It's something we're keeping a close eye on," he said. The second key part is the authority to charge crypto miners a "marginal rate" for any extra electricity Idaho Power must buy or generate for them. Marginal rates are normally higher than base rates. A report released Sept. 8, commissioned by the Biden administration, detailed the carbon footprint of digital assets. The report warned that crypto-related electricity usage could harm efforts to reduce greenhouse gas emissions. The U.S. hosts about a third of global crypto operations, according

to the report. They consume an estimated 0.9% to 1.7% of the country's electricity usage. "Some crypto-asset technologies currently require a considerable amount of electricity for asset generation, ownership and exchange," the report said. "Depending on the energy intensity of the technology used, crypto-assets could hinder broader efforts to achieve net-zero carbon pollution consistent with U.S. climate commitments and goals."

Read more at:

<https://www.idahostatesman.com/news/business/article265519861.html#storylink=cpy>

My wife and I installed beginning in 2019 (Legacy System) producing 8MW annually of residential solar panels (customer generators) adding to capacity in the neighborhood reducing load requirements for IPCO particularly during peak load times. IPCO has daily data history as shown on its own website in My Account for my residence and weather forecasts to predict load versus solar cogeneration and need for IPCO resources to meet load in the next 24 hours.

Population growth like the reported 2,000 added jobs at Micron Technology combined with science projected hotter and dryer weather conditions for the region including IPCO's service area will only increase demand for electricity. IPCO's response: it will have to add more resources to meet that demand.

Yet IPCO in the current case proposes to undercut customer generators at a time when the added capacity contributes to meeting its load demand. The current Schedules 6, 8, and 84 for customer generators and net-metering should be retained. Additionally the PUC should Order IPCO to encourage more customer generators and net-metering allowing adding more electric capacity to the power grid.

IPCO in Section 6 raises the specter of hourly and real-time Net Billing. I presume these possibilities are real capabilities. However either and particularly real-time would increase costs to IPCO.

IPCO in VODER Section 7 continues to emphasize for non-customer generators paying higher bills subsidizing customer generators. IPCO in the same section propose to design or allocate a fair share of IPCO's revenue requirement to various customer rate classes or schedules, and in Section 9 proposes to set a cap on customer generators because other rate payers are subsidizing customer generators. This refrain by IPCO is not new. The IPCO spokesman asserted in the past non-customer generators are subsidizing customer generators without adding the avoided costs or what it pays for natural gas. Ironically IPCO used the "most recent data" from its PCA request under IPC-E-22-21 while it failed to acknowledge in VODER natural gas costs forecast in the 2021 IRP (IPE-E-21-43). The PCA they essentially predict will increase due to natural gas prices or at some point apply merely incorporate the costs in the general rate base. No words are ever used by IPCO to inform all rate payers the benefit customer generators contribute to hold rates down.

VODER Section 9 proposes an eligibility cap. Any cap is ludicrous for the contributions customer generators add to the power grid and reduce avoided costs.

Section 10 sets forth 17.1 million kWh credits have been accumulated. These kWh did not vanish into thin air. These kWh reduced IPCO's own generation requirements and allowed IdaCorp to wheel that energy into the intertie market place from components of its portfolio of power projection resources. Section 10.1 suggests detailing when the Credits were accumulated would be impossible. IPCO need only look at the historic data to determine when credits were accrued and debited. The problem is the willingness and analysis to do the work.

IPCO has set in its Integrated Resource Plan a goal to become a green company in 2045 at the time proposing in VODER to terminate net-metering on the same date. IPCO to meet its green energy goal is thanks to the 12,322 customer generators producing over 118 MW, according to VODER Table 9.1.

Staff in its VODER workshop September 6, 2022, a staffer responded to a question stating the staff has submitted over 60 questions to IPCO looking to fill in holes or looking for clarifications of VODER elements. The amount of staff requests raises serious questions on the validity and unbiased truth of the VODER Study.

The PUC should reject the VODER Study for its incomplete and biased data, analysis, and recommendations.