

From: [PUCWeb Notification](#)
To: [Jan Noriyuki](#)
Subject: Notice: A comment was submitted to PUCWeb
Date: Wednesday, September 21, 2022 9:00:18 AM

The following comment was submitted via PUCWeb:

Name: Everett Coba
Submission Time: Sep 21 2022 8:54AM
Email: everettcoba1@gmail.com
Telephone: 206-931-6274
Address: 206 Bird Drive
Ketchum, ID 83340

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "Hi, My name is Everett Coba, I am very concerned about Idaho Power's newly published cost-benefit study on rooftop solar. It underestimates the value of solar by intentionally excluding measurable environmental and related benefits that impact customer rates. This threatens fair compensation for Idaho families, businesses, farms, schools, and other local entities that benefit from locally-owned solar. The Hoover and Glen canyon dams are projected to be non-usable in as close to a years time because of water shortages in the SW. Yes, this is in a different state, and those specific power generation sources don't directly effect us, but it is a view of what is possible to us in Idaho and the NW. Now is not the time to rely on old power generation sources that could fail due to a changing climate and leave millions stranded without lights and heat. We need to look to the future of onsite power sources such as solar and wind to be more resilient during this climate crisis we all are facing."
"

From: [PUCWeb Notification](#)
To: [Jan Noriyuki](#)
Subject: Notice: A comment was submitted to PUCWeb
Date: Wednesday, September 21, 2022 1:00:06 PM

The following comment was submitted via PUCWeb:

Name: Ben Sinnamon
Submission Time: Sep 21 2022 12:44PM
Email: sinnamon.ben@gmail.com
Telephone: 208-720-2085
Address: 929 EASTRIDGE DR
HAILEY, ID 83333

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "My name is Ben Sinnamon and I am an Idaho Power customer living in Hailey. I am very concerned about Idaho Power's newly published cost-benefit study on rooftop solar. It underestimates the value of solar by intentionally excluding measurable environmental and related benefits that impact customer rates. This threatens fair compensation for Idaho families, businesses, farms, schools, and other local entities that benefit from locally-owned solar. Please reject Idaho Power's study. Use a study that utilizes up-to-date data and includes ratepayer benefits such as avoided carbon emissions costs and avoided fuel price risk (i.e. the Crossborder Energy study). "

From: [Lynne Barker](#)
To: [Jan Noriyuki](#)
Cc: [dfosbury](#); [Martha Burke](#); [Kathryn Goldman](#); [Neil Bradshaw](#)
Subject: Blaine County Clean Energy Coalition Comments on IPC-E-22-22
Date: Wednesday, September 21, 2022 1:33:28 PM
Attachments: [Blaine County Clean Energy Coalition Comments on IPC-E-22-22.pdf](#)

CAUTION: This email originated outside the State of Idaho network. Verify links and attachments BEFORE you click or open, even if you recognize and/or trust the sender. Contact your agency service desk with any concerns.

Dear Commission Secretary,

Please find attached formal comments to IPC-E-22-22 from Blaine County and the City of Bellevue, City of Hailey, and City of Ketchum. All parties are municipalities of Idaho and have a direct and substantial interest in the outcome of this case as we seek to protect both municipal interests and interests of the residents, businesses and populations served.

Thank you,

Lynne

Lynne Barker
Sustainability Manager
Blaine County, ID
Tel: 208-788-6941
Cell: 206-491-0279
lbarker@co.blaine.id.us



September 13, 2022

Commission Secretary
Idaho Public Utilities Commission
P.O. Box 83720
Boise, Idaho 83720-0074

Via Email: secretary@puc.idaho.gov

RE: Case No. IPC-E-22-22: Blaine County, City of Bellevue, City of Hailey, and City of Ketchum Comments on Idaho Power Company's Value of Distributed Energy Resources Study

Dear Commission Secretary:

On behalf of Blaine County and the City of Bellevue, the City of Hailey, and the City of Ketchum, Idaho, hereinafter collectively referred to as the "Parties", please accept these comments on Case No. IPC-E-22-22, in regards to Idaho Power Company's ((hereinafter referred to as "IPC") Value of Distributed Energy Resources Study (hereinafter referred to as the "VODER Study"). The aforementioned Parties, and all municipalities organized under the laws of the state of Idaho, have agreed to provide comments on the VODER Study's methodology, results, and potential impacts.

DIRECT AND SUBSTANTIAL INTEREST

The Parties established a coalition through a memorandum of understanding for the purpose of monitoring, providing comment, and intervening in cases brought before the Idaho Public Utility Commission as deemed necessary by the Parties to protect the public interests of the Parties' respective organizations and the residents, businesses, and populations served, all of which are Idaho Power Company customers that make up the Parties' constituency. Collectively, the Parties have mutually beneficial interests in the outcome of cases brought before the Idaho Public Utility Commission as the decisions may affect local self-governance, the promotion of welfare, and preservation of public health.

Countywide, constituents include a population of 24,729 of which 23% are Hispanic / Latino; 38% of households earn less than \$50,000 annually; 12.6% of persons' income is below the poverty line including 23% of children and 5% of seniors; 1,569 employer establishments; and 3,817 nonemployer establishments. (U.S. Census, 2021)

LOCAL AND NATIONAL SOLAR INDUSTRY

The Parties have been working together to make solar energy even more affordable, available, and accessible. Over the past few years, the local solar capacity grew an average of 20% annually. This growth helps to diversify the local economy and create new, good paying jobs for residents. The solar generating capacity of IPC customers in Blaine County reached 2.367 megawatts from 242 solar energy systems.

In 2022 compared to 2021, Idaho jumped from 35th to 27th for the overall solar adoption ranking, signaling a boom in the solar industry statewide. Jobs in the solar market are at an all-time high, providing 586 Idahoans with a livelihood (SEIA 2022). The Bureau of Labor Statistics projects an annual growth in solar photovoltaic installers of 27% through 2031. The U.S. median annual salary for solar installers in 2021 was \$47,670.

Decisions relating to case IPC-E-22-22, the VODER Study, have the potential to reduce the Parties' and our constituents' access to clean energy and the economic benefits of local, distributed energy generation. Additionally, local solar businesses and jobs will likely be negatively impacted by IPC's recommended methods for valuing customer on-site generation energy exports as evidenced by similar situations in neighboring states.

Nevada Case Study - Social Cost of Carbon

In 2015, the Nevada Public Utilities Commission voted to decrease the state's net-metering export credit rates. In turn, Nevada's largest solar companies fled the market. New residential solar permit rates dropped by 92% (Murro, Shaha, 2016). More than 2,600 jobs were lost. Undervaluing the solar export credit rate will likely lead to similar outcomes in Idaho.

OVERALL VODER STUDY CONSIDERATIONS

Both the Parties and IPC have committed to clean energy and climate goals. The Parties committed to achieve 75% clean energy for municipal electricity use by 2025; 100% clean energy for municipal electricity use by 2030; 100% clean energy for the communitywide electricity supply by 2035; 100% clean energy for municipal fleet vehicles and equipment to by 2035 as technologically and economically feasible; and 100% clean energy for all energy use by 2045. The Parties further committed reduce greenhouse gas emissions by 60% by 2030.

IPC also announced a voluntary commitment to 100% clean energy by 2045. IPC further established short-term, medium-term, and long-term targets to reduce CO₂ emissions intensity from company-owned generation resources compared to the 2005 baseline year by 35% for the period of 2021-2025, 86% by 2030, and 100% by 2045.

These goals are reflective of the United States' commitment to reduce greenhouse gas emissions by 50-52% by 2030 and achieve a 100% carbon pollution-free power sector by 2035. The Bipartisan Infrastructure Investments and Jobs Act will invest more than \$65 billion in clean energy and grid modernization, and the Inflation Reduction Act includes \$369 billion in clean energy and climate investments that will create extraordinary opportunities for state and local governments that are working toward commitments to clean energy and greenhouse gas emissions reductions.

Additionally, the U.S. Environmental Protection Agency (EPA) recently announced a new regulatory initiative that will address the nation's largest sources of both climate- and health-harming pollution. The EPA is currently considering rulemaking in the power sector – the largest stationary source of greenhouse gases in the U.S. – as well as other sectors.

CALCULATING THE EXPORT CREDIT RATE

In the Idaho Public Utility Commission (the Commission) Order 35284, page 27, the Commission ordered IPC to include “an evaluation of all benefits and costs that are quantifiable, measurable and avoided costs that affect rates.” Section 4 of the VODER Study outlines the methodology and variables analyzed to estimate an export credit rate for on-site generating customers that participate in the net metering program.

It is the Parties’ opinion that certain considerations of both the costs and benefits of solar were left out of Section 4 of the VODER Study, and therefore did not lend to a just and reasonable calculation of an export credit rate. The Parties urge the Commission to ensure that environmental costs and benefits that can be quantified and that would provide direct savings to customers and communities be considered.

Avoided Environmental Costs of Solar

In Section 4.1 of the VODER Study, IPC valued the avoided environmental costs and benefits of on-site solar generation at \$0.00. It reads “Environmental benefits that do not result in direct savings, or an avoidable cost, are not included in this study. Similarly, environmental benefits based on non-quantifiable or speculative values are not included in this study.” (VODER Study, page 61).

However, IPC’s 2021 Integrated Resource Plan utilized three separate methodologies to determine the social cost of carbon (Section 9.3, page 126). Despite acknowledging the social cost of carbon, and the associated methodologies to quantify it, these were left out of the VODER Study calculations. The social cost of carbon is a relevant metric that aims to measure the impact of climate change, such as the impact of ongoing drought conditions to hydroelectric energy generation and the impact of wildfires to transmission lines and grid resilience.

The social cost of carbon is a metric that estimates the economic damages that result from emitting one additional ton of carbon dioxide into the atmosphere (Interagency Working Group on Social Cost of Greenhouse Gases, United States Government, 2016). The metric is used to establish national climate policy and regulations. Currently, the National Academies of Sciences, Engineering, and Medicine is guiding an Interagency Working Group charged with updating the social cost of carbon. Until a new cost can be set, the working group is using \$51 as the social cost of adding one ton of carbon pollution into the atmosphere.

A new tool developed by the National Oceanic and Atmospheric Administration details the financial impact of climate change on counties and tribal lands. For example, the tool estimates that Ada County can expect an annual loss of \$6.1 million from wildfires and \$387,603 from drought.

Minnesota Case Study - Social Cost of Carbon

In a similar study evaluating the value of distributed energy resources, the Minnesota PUC approved pricing carbon emissions using the federal social cost of carbon. In 2015, the cost of carbon was priced at \$37 per metric ton resulting in a calculation of 3¢ per kWh of avoided environmental costs for the net metering export credit rate.

Equity Considerations

Rooftop solar is finally becoming a realistic option for low-income residents. Prices have dropped 53% over the past 10 years (SEIA 2022). The proposed methods for valuing distributed solar

generation have the potential to significantly decrease low-income residents' access to solar energy and ability to share in the benefits of the rapidly growing solar industry.

IPC MENU OF CLEAN ENERGY OFFERINGS

In December 2021, IPC submitted an application, Case No. IPC-E-21-40, to expand its optional clean energy offerings to customers. Specifically, IPC requested establishment of a regulatory framework for a future voluntary subscription program to be called **Clean Energy Your Way**. The application was the result of a significant increase in customer preferences and desires for clean energy. Through the application, IPC stated that it "set out to design a menu of clean energy offerings that would appeal to customers of all sizes."

In comments submitted in that case, the Parties encouraged IPC and the Commission to consider the *Clean Energy Your Way* program holistically as an element of a comprehensive set of clean energy offerings for customers. The Parties reiterate that decisions on the VODER Study will determine net metering rates and whether on-site customer generation are cost-effective investments for customers, including municipalities. And decisions on IPC-E-21-43, IPC's 2021 Integrated Resource Plan, will determine investments in energy efficiency and other beneficial clean energy programs.

The Parties encourage the following considerations:

- The ability of small, rural communities to participate in the *Clean Energy Your Way* – subscription program may be out of reach financially.
- If on-site customer generation becomes out of reach financially, then small, rural communities will be left out of both access to clean energy and the economic benefits of a rapidly growing clean energy economy.
- On-site customer generation should be included in IPC's "menu" of affordable clean energy offerings.


The Parties ask that the Commission take into consideration the long-lasting and far-reaching impacts of the decision on IPC-E-22-22. A just and reasonable approach is needed that includes all of the quantifiable costs and benefits associated with on-site customer generation.

APPROVALS: Executed and effective by the undersigned parties as of the date signed. DATED this ___ day of _____, 2022.

THE PARTIES HERETO have executed this instrument.



Dick Fosbury
Blaine County Commissioner



Date

Mayor Kathryn Goldman
City of Bellevue

Date

Mayor Martha Burke
City of Hailey

Date

Mayor Neil Bradshaw
City of Ketchum

Date




APPROVALS: Executed and effective by the undersigned parties as of the date signed. DATED this ___ day of _____, 2022.

THE PARTIES HERETO have executed this instrument.

Dick Fosbury
Blaine County Commissioner

Date



Mayor Kathryn Goldman
City of Bellevue

9/21/22
Date

Mayor Martha Burke
City of Hailey

Date

Mayor Neil Bradshaw
City of Ketchum

Date

APPROVALS: Executed and effective by the undersigned parties as of the date signed. DATED this ___ day of _____, 2022.

THE PARTIES HERETO have executed this instrument.

Dick Fosbury
Blaine County Commissioner

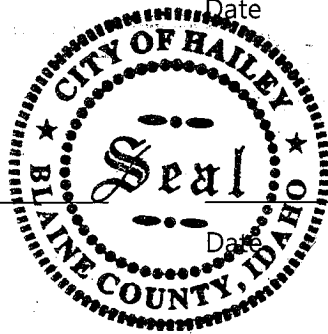
Date

Mayor Kathryn Goldman
City of Bellevue

Date

Martha Burke

Mayor Martha Burke
City of Hailey



9/19/22

Mayor Neil Bradshaw
City of Ketchum

Date



APPROVALS: Executed and effective by the undersigned parties as of the date signed. DATED this ___ day of _____, 2022.

THE PARTIES HERETO have executed this instrument.

Dick Fosbury
Blaine County Commissioner


Date

Mayor Kathryn Goldman
City of Bellevue

Date

Mayor Martha Burke
City of Hailey

Date



Mayor Neil Bradshaw
City of Ketchum

9/19/22
Date



From: [PUCWeb Notification](#)
To: [Jan Noriyuki](#)
Subject: Notice: A comment was submitted to PUCWeb
Date: Wednesday, September 21, 2022 11:00:07 AM

The following comments were submitted via PUCWeb:

Name: Louisa Moats
Submission Time: Sep 21 2022 10:07AM
Email: louisa.moats@gmail.com
Telephone: 208-720-9096
Address: 260 Elkhorn Road
Sun Valley, ID 83354

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: " I, Louisa Moats, am an Idaho Power customer living in Sun Valley. My husband and I are retired but we invested in rooftop solar about 8 years ago. I am very concerned about Idaho Power's newly published cost-benefit study on rooftop solar. It underestimates the value of solar by intentionally excluding measurable environmental and related benefits that impact customer rates. This threatens fair compensation for Idaho families, businesses, farms, schools, and other local entities that benefit from locally-owned solar. If we do not collectively use every incentive to encourage a transition to solar power, along with other environmental stewardship, our earth is headed for irreversible damage. Please reject Idaho Power's study. Use a study that utilizes up-to-date data and includes ratepayer benefits such as avoided carbon emissions costs and avoided fuel price risk (i.e. the Crossborder Energy study). Thank you!"

Name: Susan Canham
Submission Time: Sep 21 2022 10:20AM
Email: suzcanham@gmail.com
Telephone: 208-721-1465
Address: 405 Beech Street
Bellevue, ID 83313

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "I am writing in reference to Idaho Power's recent VODER report. Both my husband and I have been Idaho Power (IP) customers since moving to Idaho in 1988. My husband is now a retired carpenter. I'm a retired school teacher who does senior caregiving part-time. We participate in IP's Green program and had been encouraged by what IP states online and in newsletters regarding their commitments to clean energy. However, the VODER report both undervalues five components that are used to ascertain ECRs and fails to even quantify important benefits of rooftop solar energy (that IP said it would include back in

2021). By doing that, it denies fair compensation for individuals, schools and businesses who want to pursue clean energy via locally-owned solar which, in turn, would adversely affect the growth of that. By the end of today, the Idaho Conservation League will have submitted another study, one done independently of IP. It is from Crossborder Energy, and it is worth your time to examine it because it shows the inadequacies of the IP study. I do think we are living in a time where we still have an opportunity to be better stewards of this amazing planet we live on. Whatever decisions come from you will impact public health, the economy, the environment and our overall resilience in meeting changes in our climate. You deserve to get the most accurate information in making those decisions. I appreciate the opportunity to make comments, and I also am heartened to hear that you will be having public hearings. My hope is that you reject VODER until its errors are fixed or adopt the Crossborder one. Thank you."

From: [PUCWeb Notification](#)
To: [Jan Noriyuki](#)
Subject: Notice: A comment was submitted to PUCWeb
Date: Wednesday, September 21, 2022 2:00:09 PM

The following comments were submitted via PUCWeb:

Name: Jody Moss
Submission Time: Sep 21 2022 1:43PM
Email: mayamoss@hotmail.com
Telephone: 208-726-1041
Address: 180 Sorrel
Ketchum, ID 83340

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "Please value the power that customers with roof top solar make. We all need to work together to become carbon neutral in the future. Please use a study that utilizes up to date data and includes rate payers benefits such as avoided carbon emissions and costs and avoided fuel cost. Let please work together to keep Idaho clean."

Name: MaryCarol Nelson
Submission Time: Sep 21 2022 1:34PM
Email: skibikegarden2@gmail.com
Telephone: 509-860-8735
Address: 1541 Baldy View Drive
Hailey, ID 83333

Name of Utility Company: Idaho Power Company

Case ID: IPC-E-22-22

Comment: " Dear Idaho Public Utilities Commission, With all the sunlight that shines on our state of Idaho, we should have solar panels on every business, school and resident ! I moved here from Washington state, where I worked with a group that was very interested in our earth and the environment! Together, with our utility company, Washington State, and the community in general, we were able to put 96 solar panels on our Middle School. People were interested in the climate crisis way back then in 2014, and together, we made this project happen in a few short weeks! The people in our community are interested and serious about the climate crisis here also. We want to help by putting solar panels on our roofs, and Idaho Power Company needs to understand that we deserve Fair Rates for the solar generating capacity we would have. The whole world knows we need to be serious about clean energy. We also know we don't have much time left to change from carbon emitting fossil fuels. We can make Idaho a clean energy state, we can do our part in the nation. We can create new, good paying jobs for our residents. The Bipartisan Infrastructure Investments and Jobs Act is indeed encouraging in its investment to create extraordinary opportunities for state and local

governments that work toward commitments to clean energy and greenhouse gas emissions reduction. Idaho Power Company - We deserve Fair Rates for rooftop solar! Sincerely,
MaryCarol Nelson Hailey, Idaho"

From: [PUCWeb Notification](#)
To: [Jan Noriyuki](#)
Subject: Notice: A comment was submitted to PUCWeb
Date: Wednesday, September 21, 2022 7:00:14 AM

The following comments were submitted via PUCWeb:

Name: Nick Stenicka
Submission Time: Sep 20 2022 9:36PM
Email: nickstenicka@gmail.com
Telephone: 970-531-8295
Address: 280 South 3rd Ave.
Ketchum, ID 83340

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "My name is Nick Stenicka and I am an Idaho Power customer living in Ketchum. My wife and I have lived in Ketchum for the past 6 years and do what we can to lower our footprint. I am an economics graduate and believe that the market for renewable energies has been stifled for too long. Recently my wife and I bought into a secondary service provided by Arcadia to ensure that our energy is coming from clean sources. I am very concerned about Idaho Power's newly published cost-benefit study on rooftop solar. It underestimates the value of solar by intentionally excluding measurable environmental and related benefits that impact customer rates. This threatens fair compensation for Idaho families, businesses, farms, schools, and other local entities that benefit from locally-owned solar. Please reject Idaho Power's study. Use a study that utilizes up-to-date data and includes ratepayer benefits such as avoided carbon emissions costs and avoided fuel price risk (i.e. the Crossborder Energy"

Name: SHARON TREESE
Submission Time: Sep 20 2022 7:01PM
Email: SRTSRT0@GMAIL.COM
Telephone: 208-861-5941
Address: 1444 E GREENSBORO ST
BOISE, ID 83706

Name of Utility Company: IDAHO POWER

Case ID: IPC-E-22-22

Comment: "Idaho Power used old data and old values in its study. They didn't use categories they were told to include, falsely stating they were unquantifiable. Please use the Crossborder Energy study when making your decision. "

Name: Scott Pinizzotto

Submission Time: Sep 21 2022 2:48AM
Email: pinizzot@alumni.haas.org
Telephone: 415-305-7275
Address: 117 Corrock Drive
Ketchum, ID 83340

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "I am Scott Pinizzotto living fulltime in Ketchum with my family. For my two daughters Lila and Lexi and generations to come, I have focused the last 15 years of my career on climate change. I work for ENGIE, a French energy company focused on the global transition to low/no carbon energy, where I invest in cleantech/climatetech startups that are driving this transformation. Just in August 2022, we finished building our net-zero energy home in Ketchum. It has a high-performance envelope, fully electrified (heat pumps, induction), with a 25kW tesla solar roof, two SPAN.io smart electrical panels and wired for EV charging, including bidirectional home backup from the Ford F150 Lightning EV (equal capacity to 10 tesla powerwalls). I made this investment above energy code and in DERs because we need to accelerate our transition from fossil fuels on our grid and transportation. It is unbelievable the inaccurate and incomplete approach Idaho Power took in their cost-benefit study on rooftop solar. Additionally, it does not look holistically at the problem/opportunity of the unprecedented new load that will come from the tsunami of EVs and how distributed solar + storage/EVs will be a critical flexibility tool to manage this new load. We should be figuring out rates to increase solar adoption, not deter adoption. Please reject Idaho Power's study for one that includes holistic ratepayer benefits, including load/flexibility of EVs + rooftop solar. Though our house may be net zero energy, we will have significant load needed from the grid for charging of EVs, a tremendous flexibility asset for Idaho Power. I would be happy to give you a tour of my home – it may be cutting-edge now but in 3-5 years there will be many more coming. Thanks, Scott"

From: [PUCWeb Notification](#)
To: [Jan Noriyuki](#)
Subject: Notice: A comment was submitted to PUCWeb
Date: Wednesday, September 21, 2022 12:00:08 PM

The following comments were submitted via PUCWeb:

Name: john kaiser
Submission Time: Sep 21 2022 11:50AM
Email: jkaiserj@gmail.com
Telephone: 503-539-8751
Address: po box 6712
Ketchum, ID 83340

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "My name is John Kaiser and I am an Idaho Power customer living in Ketchum Idaho. I am a bookeeper, outdoor enthusiast, a husband and a father. I try to plan for my future as well as the future of my family. I am very concerned about Idaho Power's newly published cost-benefit study on rooftop solar. It underestimates the value of solar by intentionally excluding measurable environmental and related benefits that impact customer rates. This threatens fair compensation for Idaho families, businesses, farms, schools, and other local entities that benefit from locally-owned solar. I care about these issues because I've seen solar get incentivized in other states and it works. Locally owned solar generation keeps balance in the electrical infrastructure and will promote growth of solar power conversions. Please reject Idaho Power's study. Use a study that utilizes up-to-date data and includes ratepayer benefits such as avoided carbon emissions costs and avoided fuel price risk (i.e. the Crossborder Energy study). Thank you!"

Name: Michelle Praggastis
Submission Time: Sep 21 2022 11:26AM
Email: michprag1@mac.com
Telephone: 208-622-7271
Address: 106 Grey Eagle
Sun Valley, ID 83353

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "My name is Michelle Praggastis and I am an Idaho Power customer living in Sun Valley, Idaho. I have lived in the Wood River Valley for the better part of 54 years and have seen the changes brought on by the increase in population. I am very concerned about Idaho Power's newly published cost-benefit study on rooftop solar. It underestimates the value of solar by intentionally excluding measurable environmental and related benefits that impact customer rates. This threatens fair compensation for Idaho families, businesses, farms,

schools, and other local entities that benefit from locally-owned solar. I feel that it is important for the future of Idaho that we encourage more alternative energy sources especially solar power. Fair compensation is the one way that I feel we can encourage the current and future residents of the state to invest in Idaho's future. Please reject Idaho Power's study. Use a study that utilizes up-to-date data and includes ratepayer benefits such as avoided carbon emissions costs and avoided fuel price risk (i.e. the Crossborder Energy study). Thank you!"

Name: Jason Kreitler
Submission Time: Sep 21 2022 11:55AM
Email: jkreitler@gmail.com
Telephone: 208-854-9440
Address: 2301 N 24th St
boise, ID 83702

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "This is Jason Kreitler, and I am an Idaho Power customer living in Boise, ID. Professionally, I am a research scientist studying climate change, wildland fire, and natural resource management issues in the American West. I am also the proud parent of an eight year old boy, and have the privilege of introducing him to the wonders of Idaho and the natural world. However, his introduction to Idaho's forests, mountains, and rivers, and my memories of the same, are two starkly different realizations thanks to climate change and a legacy of poor resource management decisions. Here, you have the opportunity to make progress for generations of Idahoans, Americans, and humanity. Climate change does not respect borders or care who bears the burden of past resource use. In Idaho Power's sham of a cost-benefit study assessing rooftop solar, I find deficiencies that are at best a case of poor research and sloppy methods, or more likely, an intentional undervaluation of key benefits to continue stifling consumer choice when it comes to distributed customer generation. Even if you were to only consider the limited economic benefits considered in the Idaho Power study, but used the more appropriate figures from the Crossborder Energy study, the export credit rate for distributed solar would be three times (3X!!!) what Idaho Power is claiming using their blatantly flawed logic. This is without considering the three additional classes of real and measurable benefits that ID Power said they would study, but then omitted when they found a loophole in the PUC's order. Is it any wonder that Idahoans are fed up with our utility's monopolistic shenanigans? I urge you to reject this study by Idaho Power. The Crossborder Energy study has identified numerous flaws in ID Power's calculations. At minimum, it would seem most prudent to send ID Power back to the drawing board and return with an objective study to determine a proper export credit rate. Better yet, adopt the Crossborder Energy study and let's make progress on climate change instead of delaying this process for another five years while killing a source of good paying local jobs that actually help all sectors of ID and move us on a path towards distributed energy resilience and independence. "

Name: Courtney Hamilton
Submission Time: Sep 21 2022 11:46AM

Email: hamilton.courtney1@gmail.com
Telephone: 208-481-1211
Address: 130 Bird Drive
Ketchum, ID 83340

Name of Utility Company: Idaho Power Company

Case ID: IPC-E-22-22

Comment: "Hello, As an Idaho Power customer in Ketchum, I am very concerned about the potential undervaluation of rooftop solar as demonstrated in Idaho Power's recent study. We are already seeing serious environmental costs to traditional power sources, and to intentionally exclude those and many other consumer costs from the report is detrimental to everyone in our state. I am a fifth generation Idahoan, and I know that we all want to help make our state the best place to live, and putting solar panels on our roof is one way to help contribute. By not fairly compensating Idahoans for the power that they're providing to the grid, Idaho Power is taking advantage of this mentality and ignoring many of the benefits - both long and short-term - that rooftop solar has to offer our families, businesses, farms, and schools. Support the long-term energy sustainability and environmental health of our state and its inhabitants and reject the Idaho Power study. Please use a study such as the Crossborder Energy Study that utilizes up-to-date data and includes ratepayer benefits such as lower carbon emissions costs and avoided fuel price risk. The people of Idaho deserve a fair reimbursement rate and as our elected officials, you owe it to rate-payers to base your decisions on the whole truth, not just part of it. Thank you, Courtney"

From: [PUCWeb Notification](#)
To: [Jan Noriyuki](#)
Subject: Notice: A comment was submitted to PUCWeb
Date: Wednesday, September 21, 2022 10:00:09 AM

The following comments were submitted via PUCWeb:

Name: JOHN GALGANO
Submission Time: Sep 21 2022 9:23AM
Email: jgalgano@hotmail.com
Telephone: 208-720-2996
Address: 180 CLOVERLY LN
HAILEY, ID 83333

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "My name is Johnny Galgano and I am an Idaho Power customer living in Hailey. I am retired living with my bride and son and on a fixed budget. I built a home in 2016 and put in place 28 solar panels to offset the fact that my bride doesn't turn off the lights. I am very concerned about Idaho Power's newly published cost-benefit study on rooftop solar. It underestimates the value of solar by intentionally excluding measurable environmental and related benefits that impact customer rates. This threatens fair compensation for Idaho families, businesses, farms, schools, and other local entities that benefit from locally-owned solar. I care about these issues because as I have previously mentioned I am retired and living on a fixed income. Please reject Idaho Power's study. Use a study that utilizes up-to-date data and includes ratepayer benefits such as avoided carbon emissions costs and avoided fuel price risk (i.e. the Crossborder Energy study). Thank you! Be well Johnny Galgano 180 Cloverly Lane Hailey, Idaho 83333 208-720-2996 "

Name: Gretchen B
Submission Time: Sep 21 2022 9:54AM
Email: d@gmail.com
Telephone: 208309
Address: 180 C
Hailey, ID 83333

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "My name is Gretchen B. and I am an Idaho Power customer living in Hailey. I am a recent retiree and would like to continue to have the cost benefit of owning Solar Panels on my home I also enjoy the environmental benefit that solar panels give to our community. I am very concerned about Idaho Power's newly published cost-benefit study on rooftop solar. It underestimates the value of solar by intentionally excluding measurable environmental and related benefits that impact customer rates. This threatens fair compensation for Idaho

families, businesses, farms, schools, and other local entities that benefit from locally-owned solar. I care about these issues because there are many in our area that must work 3 jobs to make ends meet. They should not be subject to additional preventable financial burden, especially if their investment is beneficial to our environment. Please reject Idaho Power's study. Use a study that utilizes up-to-date data and includes ratepayer benefits such as avoided carbon emissions costs and avoided fuel price risk (i.e. the Crossborder Energy study). Thank you!"

Name: Jay B
Submission Time: Sep 21 2022 9:59AM
Email: j@gmail.com
Telephone: 208309
Address: 180 C
Hailey, ID 83333

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "My name is Jay B. and I am an Idaho Power customer living in Hailey. I am a recent retiree and Engineer. I value the energy efficiency of my solar panel investment and would like to continue to receive appropriate price benefit from them. I also value the benefit solar panels provide to our environment. I am very concerned about Idaho Power's newly published cost-benefit study on rooftop solar. It underestimates the value of solar by intentionally excluding measurable environmental and related benefits that impact customer rates. This threatens fair compensation for Idaho families, businesses, farms, schools, and other local entities that benefit from locally-owned solar. I care about these issues because there are many people in our area that must work 3 jobs to make ends meet. It would be unfair to place additional financial burden on these people after they have made a sound investment for their future and the environment. Please reject Idaho Power's study. Use a study that utilizes up-to-date data and includes ratepayer benefits such as avoided carbon emissions costs and avoided fuel price risk (i.e. the Crossborder Energy study). Thank you!"

Name: Michael Kraynick
Submission Time: Sep 21 2022 9:41AM
Email: mkraynick@cox.net
Telephone: 208-788-4668
Address: 113 E. BULLION STREET STE A
Hailey, ID 83333-8770

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "My name is Michael J. Kraynick. I am an attorney residing in Hailey, Idaho and a proponent of clean, locally generated energy to help with clean energy production and put my

money where my mouth is in installing a roof solar system at my residence. I am very concerned about Idaho Power's newly published cost-benefit study on rooftop solar. It underestimates the value of solar by intentionally excluding measurable environmental and related benefits that impact customer rates. This threatens fair compensation for Idaho families, businesses, farms, schools, and other local entities that benefit from locally-owned solar. I care about these issues because climate change is affecting all of us and will continue to have an impact if we do nothing and the more we can incentivize each and every citizen to contribute, reduce and re-use, the greater the impact will be to save our planet. Please reject Idaho Power's study. Use a study that utilizes up-to-date, impartial data and includes ratepayer benefits such as avoided carbon emissions costs and avoided fuel price risk (i.e. the Crossborder Energy study). It is far past time to be proactive, each and every Idahoan should be doing his or her part, and that includes Idaho Power. Thank you! "

Name: John Reuter
Submission Time: Sep 21 2022 9:11AM
Email: john@bluebirdsolaridaho.com
Telephone: 208-721-2922
Address: 102 S 4th Avenue
Hailey, ID 83333

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "My name is John Reuter and I am an Idaho Power customer and a solar installer in Hailey, ID. Idaho Power's cost-benefit study is absurd. Idaho Power has 100% renewable energy goals, yet is undervaluing the people that are working on their OWN to meet renewable energy goals. I find it particularly ridiculous when Idaho Power sends me notices to reduce electrical consumption during the heat of the summer to reduce strain on the grid. During those periods, my solar array is producing considerably more energy than my little house is using. Please reject Idaho Power's study. Use a study that utilizes up-to-date data and includes ratepayer benefits such as avoided carbon emissions costs and avoided fuel price risk (i.e. the Crossborder Energy study). Thank you very much. "

From: [PUCWeb Notification](#)
To: [Jan Noriyuki](#)
Subject: Notice: A comment was submitted to PUCWeb
Date: Wednesday, September 21, 2022 4:00:07 PM

The following comments were submitted via PUCWeb:

Name: Nathan Kolar
Submission Time: Sep 21 2022 3:27PM
Email: nathankolar@gmail.com
Telephone: 208-578-6201
Address: 310 N 4th Ave
Hailey, ID 83333

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "My name is Nathan Kolar and I am an Idaho Power customer living in Hailey, ID. I am a father of three, a school teacher, and, like many of my fellow Idahoans, a lover of the outdoors and concerned about the effects of climate change. I am concerned about Idaho Power's newly published cost-benefit study on rooftop solar. From what I've been told, it underestimates the value of solar by intentionally excluding measurable environmental and related benefits that impact customer rates, which is a common blind spot for much governmental and corporate policy. This threatens fair compensation for Idaho families, businesses, farms, schools, and other local entities that benefit from locally-owned solar. I care about these issues because it's essential that private citizens be able to generate as much of their own energy as possible. Living in a state such as Idaho that prizes self-reliance and self-sustainability, this seems like a no-brainer. Please reject Idaho Power's study. Use a study that utilizes up-to-date data and includes ratepayer benefits such as avoided carbon emissions costs and avoided fuel price risk (i.e. the Crossborder Energy study). Sincerely, Nathan"

Name: Thad Farnham
Submission Time: Sep 21 2022 3:34PM
Email: Thadfarnham@gmail.com
Telephone: 208-720-1104
Address: PO Box 3535
Ketchum, ID 83340

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "My name is Thad Farnham and I am an Idaho power customer in Catchem Idaho. I am a building contractor and have built a number of houses with rooftop solar including my own home. I feel Idaho Powers study on cost benefits of rooftop solar is flawed by not looking at Many benefits including a more robust ability to handle power outages. Idaho Power has been planning a redundant powerline into the Wood River Valley to guard against a prolonged

power outage. If we have more rooftop solar with batteries that reduces the amount of power needed and would make it more feasible to have a small generation station in the valley instead of an entire duplication of transmission lines. Another potential cost savings not included in the study is becoming less dependent on fuels that fluctuate in price. Natural gas is approximately twice as expensive as it was a year ago and will continue to fluctuate with supply and demand. we also continue to spend billions of dollars mitigating the effects of the Hydro power dams on migrating fish. Even Mike Simpson sees that the only hope for these fish includes damn removal which is a real cost and will be mitigated by rooftop solar supplying more energy. Idaho power doesn't include any of these potential cost benefits in their study. Idaho Power claims to be promoting renewable energy and its advertising but I would like to see them back it up by promoting rooftop solar as part of the solution."

Name: Chad Brown
Submission Time: Sep 21 2022 3:21PM
Email: chadsbrown@hotmail.com
Telephone: 208-726-2440
Address: 611 3rd Ave N
Hailey, ID 83333

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "My name is Chad Brown and I am an Idaho Power customer living in Hailey, Idaho. I am a local home builder, outdoorsman, father and lover of nature and Idaho. I am very concerned about Idaho Power's newly published cost-benefit study on rooftop solar. It underestimates the value of solar by intentionally excluding measurable environmental and related benefits that impact customer rates. This threatens fair compensation for Idaho families, businesses, farms, schools, and other local entities that benefit from locally-owned solar. I care about these issues because I think our planet is in real trouble and I don't want my children to burn up on a ball of flames. Please reject Idaho Power's study. Use a study that utilizes up-to-date data and includes ratepayer benefits such as avoided carbon emissions costs and avoided fuel price risk (i.e. the Crossborder Energy study). "

Name: James Van Dinter
Submission Time: Sep 21 2022 3:27PM
Email: jvandinter@centurylink.net
Telephone: 208-297-8288
Address: 12088 W Tidewater Dr
Boise, ID 83713

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "I request that you carefully review what Idaho says is its VODER study and

realize that it is a highly flawed report using dated information to convince you of the need to change the present rate for home solar providers. Their study also fails to address all the areas that the commission requested them to address. I ask that you review the alternate study provided by the Sierra Club and number of other organizations. This study addresses all the areas of concern that you requested Idaho Power to address. It also uses current data in its analyses of the value of solar impact and cost on the Idaho Power grid. "

Name: alexander douglas
Submission Time: Sep 21 2022 3:57PM
Email: asdatlarge@gmail.com
Telephone: 208-721-1120
Address: po box 3733
ketchum, ID 83340

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "My name is Alexander Douglas and I am an Idaho Power customer living in Ketchum. I am a 30 year Idaho resident with a diverse professional background. I am very concerned about Idaho Power's newly published cost-benefit study on rooftop solar. It underestimates the value of solar by intentionally excluding measurable environmental and related benefits that impact customer rates. This threatens fair compensation for Idaho families, businesses, farms, schools, and other local entities that benefit from locally-owned solar. I care about these issues because we need an all of the above strategy to confront climate change, including decommissioning the lower Snake River dams and installing as much local power as possible while decarbonizing the regional grid. Please reject Idaho Power's study. Use a study that utilizes up-to-date data and includes ratepayer benefits such as avoided carbon emissions costs and avoided fuel price risk (i.e. the Crossborder Energy study). "
