Subject: Notice: A comment was submitted to PUCWeb Date: Saturday, October 8, 2022 10:00:07 AM

The following comment was submitted via PUCWeb:

Name: Scott Neumann

Submission Time: Oct 8 2022 9:57AM

Email: spneumann@gmail.com Telephone: 408-525-9636 Address: 217 Willoway Rd.

Hailey, ID 83333

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "We should encourage the adoption of residential solar by compensation for generation at reasonable rates. the proposed rate of 3.8 cents would discourage the adoption of a truly renewable energy source."

**Subject:** Notice: A comment was submitted to PUCWeb **Date:** Saturday, October 8, 2022 5:00:08 PM

The following comment was submitted via PUCWeb:

Name: tamar dolgen

Submission Time: Oct 8 2022 4:02PM Email: tamar.dolgen@gmail.com

Telephone: 310-595-4813 Address: 205 Sutton place Ketchum, ID 83340

Name of Utility Company: Idaho power

Case ID: IPC-E-22-22

Comment: "I currently do not have solar power but I am thinking about it and believe that it is important for energy sustainability for our state. Please do not reduce the rate to buy back solar energy. It's important to keep the higher rates as an incentive for homes to move to solar."

From: Ann Swanson (ann.swanson@gmail.com) Sent You a Personal Message

To: <u>Jan Noriyuki</u>

**Subject:** IPC-E-22-22 Public Comment

Date: Saturday, October 8, 2022 7:45:58 PM

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 Idaho Public Utilities Commission.

#### Dear IPUC,

I invested in solar panels for my home several years ago. Idaho Power is trying to shortchange those who changed to solar, claiming the compensation rates are now too high. This was the conclusion of their own study.

Crossborder's study shows Idaho Power often used outdated data and made poor assumptions to arrive at lower compensation rates. The company also neglected to include benefits such as the long-term hedge against volatile natural gas prices and avoiding the rate impacts of carbon emissions, resulting in artificially lower values that will ultimately discourage locally-owned solar.

We should be doing everything to ENCOURAGE solar and alternative energy. A decrease in rates would disincentivize this choice.

Thanks,

Ann

Please look carefully at the independent study conducted by Crossborder Energy, which points out several shortcomings in Idaho Power's own study on the costs and benefits of customer-owned rooftop solar. Idaho Power will use this study to justify trying to reduce compensation rates to solar owners. To arrive at fair rates, we first need a fair study.

Crossborder's study states, "We conclude that Idaho Power?s choice of assumptions and calculation methods significantly undervalue the five components that the utility quantified. We present our own calculations of an ECR with these five elements. In addition, the VODER Study fails to quantify important benefits of distributed solar that the Commission directed the utility to analyze in Order No. 35284 -- benefits that are known and measurable, will impact rates, and will benefit Idaho ratepayers and citizens.?

Idahoans deserve solar rates based on a more fair and complete analysis. I urge you to reject Idaho Power's study and look to Crossborder's study as a more accurate measure of the value (to ALL ratepayers) of customer-owned solar power.

Sincerely,

Ann Swanson 2161 Diane Lane Pocatello, ID 83201 ann.swanson@gmail.com (208) 244-8521

From: LISA HECHT
To: Jan Noriyuki

**Subject:** Case Comment: IPC-E-22-22

Date: Sunday, October 9, 2022 11:59:09 PM
Attachments: Comments for IPC-E-22-22.docx

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 PUC,

My comments on Case IPC-E-22-22, the Idaho Power VODER study, are attached.

Respectfully,

Lisa Hecht 4920 E Sagewood Drive Boise, ID. 83716

### Comments for IPC-E-22-22

10/9/22

# Who I am and my perspective:

My name is Lisa Hecht. I live at 4920 E. Sagewood Drive in Boise, Idaho. I have been an Idaho Power customer since 1980, a shareholder since I was 3 years old, and an IRP attendee for about 10 years. My degree was in Electrical and Computer Engineering.

# What isn't in the study and should be:

#### Value of Reduced Risks:

- Climate change impacts (e.g., fire, flooding) could damage transmission and distribution (e.g., wooden poles), major generating facilities, or loss of major interconnections. DERs and micro-grids could keep power functioning in local areas and reduce losses due to outages. Solar, other customer generation, and storage are valuable in reducing losses.
- Risk due to hacking, e.g., from Russia or hostile sources that could bring down major power centers. Customers who can continue to generate locally with DERs and storage could reduce risk. If solar is discouraged, batteries will be also, since that is a natural next step, which also sometimes occurs in tandem with customer solar installation.
- Consideration of customers in Idaho Power's Territory with rooftop solar generation help Idaho Power to meet Oregon's RPS. What is the value of avoided cost of noncompliance to Oregon's RPS?
- Coal- and gas-fired plants have significantly greater planned and unplanned downtime compared to distributed solar with no mechanical moving parts and no potential fuel disruption or price risk. How much greater is the total planned and esp. unplanned downtime for fossil fuels and fuel supply vs. customer-generated solar?
- Price-and availability risk-hedge:
  - o In section 4.1.1.2 is noted: "The value for the ECR, for purposes of the study, uses a historically based indicative price based on a 3-year average of the ELAP price. Appendix 4.3 provides the average ELAP hourly price for 2019 through 2021." The analysis would therefore not have captured the dramatic increases in price and availability of fossil fuels based on bounce back from the depths of COVID-19 and Russia's invasion of Ukraine. Per the PUC's directive, a final VODER study should incorporate this data.
  - Fuel availability and price for fossil fuels fluctuate based on world events and has recently had a large impact on natural gas, oil, and transportation fuels. Locallygenerated solar-, wind-, or small-hydro power could reduce demand for worldwide commodities like fossil fuels, thus reducing energy prices for all Idaho Power customers.

Value of Avoided Energy Costs:

- To postpone distribution upgrades, Idaho Power should provide incentives for energy efficiency to all who apply for solar PV installations.
- The potential for Vehicle-to-Grid energy to lower peak costs. Solar and batteries are
  increasingly found in the same household. If solar power is not valued, more solar
  customers will choose to keep rather than export the energy (e.g., become nonexporting systems). This could reduce energy available for peak demand situations,
  creating greater risk of Loss of Load.
- Why does Idaho Power not simply implement a more granular Time of Day pricing?

## Comments on what is in the study:

- Measurement interval—should continue to be calculated monthly.
  - Page 1 of Idaho Power's VODER executive summary states: "The ECR benefit and cost components described in the study can vary in value depending on the use of net excess exported energy measured on a net hourly or real-time measurement Executive Summary Value of Distributed Energy Resources Study Page 2 interval". Rather than change the measurement interval, why not implement more granular Time-of-Day pricing? Customers generating power typically have more power over their use than their generation. And TOD is applicable to, and can be acted on by, all customer classes. Thus, it lowers risk of excessive demand at peak, and is fairer. This also reduces the need for customers to purchase new bi-directional meters.
  - O Page 6 of the VODER Introduction states:

    "The circumstances that existed when the Commission initially established Idaho Power's net metering policies and practices have changed dramatically over the last two decades. As more customers install on-site generation, the existing compensation structures do not account for the nuances of the current environment. For example, on-site customer-generators use energy from the utility at night, when the sun doesn't shine, or at any moment the on-site generation system cannot meet a customer's energy needs. As a result, a monthly measurement interval doesn't accurately reflect the value of the grid's bi-directional service (energy sent both to and from the utility's electric grid) provided to on-site customer-generators during different hours and days of the billing period nor the value of the energy being produced. "

The fact that the sun doesn't shine at night hasn't changed. The most direct way to reflect the value of the value of electricity \*in either direction\* is to create Time-of-Use charges that are more granular than those implemented now. This would apply to all customer classes and therefore be most powerful and fair.

 Value of RECs sold by Idaho Power should acknowledge value of customer-generated excess energy as at least as valuable as the RECs it sells, since that customer-generated clean has the characteristics that Idaho Power is selling at a premium to other customers.

- Timing of updates to export credit rate, expiring credits, billing structure
  - Updates should not occur more frequently than the average homeowners' stay
    in their homes, at least 7 years, or longer, since this is a significant investment
    and customers should at least be able to break even within an average stay.
     Many customers who spoke at earlier PUC hearings on the Value of Solar were
    making purchases for their retirement, so have predictable, stable costs.'

## Other perspectives:

- Idaho Power will be challenged not only to meet rapidly-growing customer demand for electricity (including EV growth and electrification of HVAC and water heating) in its territory, but also to do it with clean energy. Idaho also needs to preserve as much land as possible for housing and crops, and can best conserve land by encouraging use of existing rooftops with favorable characteristics for solar to provide electricity generation. This is a larger but important social imperative that will be encouraged by a fair return on customers' investments in energy generation on their homes. It could also impact food prices, since food grown locally incurs fewer transportation costs.
- Idaho Power and its customers can lower cost of electricity to all by combining customer
  investment in solar PV power, Time-of-Use, and ultimately, some battery storage to
  cover peak hours from 4-10pm in the summer. Fair returns will encourage both solar PV
  and battery investments and demand reduction during peak hours. Vermont has
  "rented" batteries to customers to cut peak, which saved all customer energy due to
  avoided generation, shutdowns, and T&D losses.
- High connection costs have been shown to discourage energy efficiency. The cost of connecting a customer-generation system to IPC should remain low to encourage this.
- Acknowledge and address risks:
  - Fuel price and availability ("price-hedge")
  - o Downtime of coal-fired and gas-plants, for maintenance and unexpected events
  - Cyber risks and the advantages of distributed power to single major power sites
  - Carbon tax risk: all the U.S.' major trading partners have implemented or are soon expected to implement, carbon pricing, as a carbon tax or cap-and-trade.
     Carbon border adjustments will raise the price of U.S. exports and prod the U.S. government into creating our own carbon pricing, to capture the revenue internally to the U.S. that would otherwise flow to other countries as part of the Carbon border adjustment.
- How does customer generation (e.g., rooftop solar) affect Idaho Power's Power Cost Adjustment? How does this affect Idaho Power's compensation and preferences?

Thank you, PUC, for providing us this opportunity to comment on the VODER study.

Lisa Hecht

**Subject:** Notice: A comment was submitted to PUCWeb **Date:** Monday, October 10, 2022 8:00:13 AM

The following comment was submitted via PUCWeb:

Name: Michael Kochert

Submission Time: Oct 10 2022 7:35AM

Email: mkochert@juno.com Telephone: 208-308-8046 Address: 1622 S 1625 E Gooding, ID 83330

Name of Utility Company: Idaho Power Company

Case ID: IPC-E-22-22

Comment: "My wife and I have a 6 kW solar array on our farm north of Gooding, and I would like to comment on Idaho Power (IPC) Value of Distributed Energy Resources Study (VODER Study). I am concerned because I believe that the VODER Study is biased. IPCs choice of assumptions and calculation methods significantly undervalue the five components (avoided energy costs, avoided generation capacity, T&D deferral, avoided line losses, and integration costs) that the utility quantified. The VODER Study also fails to quantify important benefits of distributed solar that the Commission directed the utility to analyze in Order No. 35284. These benefits are known and measurable. They will impact rates and will benefit Idaho ratepayers and citizens. These include the benefits of a long-term physical hedge against volatile natural gas prices and of avoiding the rate impacts of carbon emissions."

From: Ruth Merrill (ruthemerrill@gmail.com) Sent You a Personal Message

To: <u>Jan Noriyuki</u>

**Subject:** IPC-E-22-22 Public Comment

**Date:** Monday, October 10, 2022 9:19:45 AM

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 Idaho Public Utilities Commission.

I am sure you are aware of the continuing, devastating impacts of climate change. I write this plea to you as the full Hunter Moon rises orange in the smoke from still raging wildfires in October. We all must do whatever we can to curb the impact. In Idaho, one dramatic contribution is solar energy. People who are considering going solar need to have every incentive. Please consider the findings of the independent solar study for fair rates and reject Idaho Power's findings.

Please look carefully at the independent study conducted by Crossborder Energy, which points out several shortcomings in Idaho Power's own study on the costs and benefits of customer-owned rooftop solar. Idaho Power will use this study to justify trying to reduce compensation rates to solar owners. To arrive at fair rates, we first need a fair study.

Crossborder's study states, "We conclude that Idaho Power?s choice of assumptions and calculation methods significantly undervalue the five components that the utility quantified. We present our own calculations of an ECR with these five elements. In addition, the VODER Study fails to quantify important benefits of distributed solar that the Commission directed the utility to analyze in Order No. 35284 -- benefits that are known and measurable, will impact rates, and will benefit Idaho ratepayers and citizens.?

Idahoans deserve solar rates based on a more fair and complete analysis. I urge you to reject Idaho Power's study and look to Crossborder's study as a more accurate measure of the value (to ALL ratepayers) of customer-owned solar power.

Sincerely,

Ruth Merrill 2047 South Broxon Street Boise, ID 83705 ruthemerrill@gmail.com (208) 949-3931

**Subject:** Notice: A comment was submitted to PUCWeb **Date:** Monday, October 10, 2022 1:00:07 PM

The following comment was submitted via PUCWeb:

Name: Jay Krajic

Submission Time: Oct 10 2022 12:40PM

Email: jaywkrajic@msn.com Telephone: 208-338-5618 Address: 808 N 25th Street

Boise, ID 83702

Name of Utility Company: Idaho power

Case ID: IPC-E-22-22

Comment: "I am urging the PUC to keep the credit rate for Idaho Power's solar credit program. My house is all electric and have solar panels on my roof."

From: Deanie Gilbert (sandbrig@aol.com) Sent You a Personal Message

To: <u>Jan Noriyuki</u>

**Subject:** IPC-E-22-22 Public Comment

**Date:** Monday, October 10, 2022 2:19:05 PM

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 Idaho Public Utilities Commission.

We purchased our rooftop solar Array in December 2021, fully anticipating to be FAIRLY Compensated by Idaho Power for our contribution to the energy grid and to a carbon neutral future to preserve our planet for our descendants for years to come

Please look carefully at the independent study conducted by Crossborder Energy, which points out several shortcomings in Idaho Power's own study on the costs and benefits of customer-owned rooftop solar. Idaho Power will use this study to justify trying to reduce compensation rates to solar owners. To arrive at fair rates, we first need a fair study.

Crossborder's study states, "We conclude that Idaho Power?s choice of assumptions and calculation methods significantly undervalue the five components that the utility quantified. We present our own calculations of an ECR with these five elements. In addition, the VODER Study fails to quantify important benefits of distributed solar that the Commission directed the utility to analyze in Order No. 35284 -- benefits that are known and measurable, will impact rates, and will benefit Idaho ratepayers and citizens.?

Idahoans deserve solar rates based on a more fair and complete analysis. I urge you to reject Idaho Power's study and look to Crossborder's study as a more accurate measure of the value (to ALL ratepayers) of customer-owned solar power.

Sincerely,

Deanie Gilbert 5304 Auburn Pl Caldwell, ID 83607 sandbrig@aol.com (208) 859-4222

From: Kari Wolff (kwolff1209@gmail.com) Sent You a Personal Message

To: <u>Jan Noriyuki</u>

**Subject:** IPC-E-22-22 Public Comment

**Date:** Monday, October 10, 2022 2:54:44 PM

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 Idaho Public Utilities Commission.

Please look carefully at the independent study conducted by Crossborder Energy, which points out several shortcomings in Idaho Power's own study on the costs and benefits of customer-owned rooftop solar. Idaho Power will use this study to justify trying to reduce compensation rates to solar owners. To arrive at fair rates, we first need a fair study.

Crossborder's study states, "We conclude that Idaho Power?s choice of assumptions and calculation methods significantly undervalue the five components that the utility quantified. We present our own calculations of an ECR with these five elements. In addition, the VODER Study fails to quantify important benefits of distributed solar that the Commission directed the utility to analyze in Order No. 35284 -- benefits that are known and measurable, will impact rates, and will benefit Idaho ratepayers and citizens.?

Idahoans deserve solar rates based on a more fair and complete analysis. I urge you to reject Idaho Power's study and look to Crossborder's study as a more accurate measure of the value (to ALL ratepayers) of customer-owned solar power.

Sincerely,

Kari Wolff 12562 Deerbrush Ct Nampa, ID 83651 kwolff1209@gmail.com (619) 993-5531

Subject: Notice: A comment was submitted to PUCWeb Date: Monday, October 10, 2022 4:00:08 PM

The following comment was submitted via PUCWeb:

Name: Jesse Simpson

Submission Time: Oct 10 2022 3:14PM

Email: uncle.jessee@gmail.com Telephone: 208-871-8749

Address: 2708 S Inverness Way

Boise, ID 83705

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "Dear Idaho PUC, Idahoans deserve the right to own their electricity via photovoltaics, to utilize the sunshine, and be given an equal exchange rate for that power. Idaho Power only gains from these individual investment as do all Idaho residents. IPC is trying to further their grip on the available profits from Idahoans pockets. They have no problem spending money to fight solar options because they want the consumer to have pay them till the end of time. Solar PV gives the consumer an option along with Idaho Power company. Nobody knows what the future climate holds for us and whether there will be water in the dams or cheap fossil fuels that currently provide rate payers cheap power. The sun is a resource that we all "equally" have access to. Idaho Power wants to de-value that equal access for their own future gains. Solar PV provides a way for individuals to empower themselves, support their families, educate younger generations, and utilize the sunshine which rises everyday, PV technology is a part of the answer to creating Equality and Equity for all. Let the fair market play out here and please do not give Idaho Power the ability to control this abundant resource we all EQUALLY have access to. Please stand up for the people not for the Utility by NOT devaluing the electricity created by the sun via photovoltaics. Our kids are counting on us to build a better place than we have now and this case is a catalyst for that future. Thanks for a fair chance at equality and taking a deep look at what this situation with Idaho Power and their fight to devalue the sunshine Best Regards, Jesse Simpson "

-----

[Open in the PUC Intranet application]

From: <u>Doug Wagoner (dwag253610@aol.com) Sent You a Personal Message</u>

To: <u>Jan Noriyuki</u>

**Subject:** IPC-E-22-22 Public Comment

**Date:** Tuesday, October 11, 2022 2:16:59 AM

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 Idaho Public Utilities Commission.

Please look carefully at the independent study conducted by Crossborder Energy, which points out several shortcomings in Idaho Power's own study on the costs and benefits of customer-owned rooftop solar. Idaho Power will use this study to justify trying to reduce compensation rates to solar owners. To arrive at fair rates, we first need a fair study.

Crossborder's study states, "We conclude that Idaho Power?s choice of assumptions and calculation methods significantly undervalue the five components that the utility quantified. We present our own calculations of an ECR with these five elements. In addition, the VODER Study fails to quantify important benefits of distributed solar that the Commission directed the utility to analyze in Order No. 35284 -- benefits that are known and measurable, will impact rates, and will benefit Idaho ratepayers and citizens.?

Idahoans deserve solar rates based on a more fair and complete analysis. I urge you to reject Idaho Power's study and look to Crossborder's study as a more accurate measure of the value (to ALL ratepayers) of customer-owned solar power.

Sincerely,

Doug Wagoner 4989 E Saint Anthony Lane Post Falls, ID 83854 dwag253610@aol.com (208) 618-1042

**Subject:** Notice: A comment was submitted to PUCWeb **Date:** Tuesday, October 11, 2022 3:00:06 PM

The following comment was submitted via PUCWeb:

Name: Kim Mazik

Submission Time: Oct 11 2022 2:37PM

Email: kmazik@cox.net Telephone: 208-309-0281 Address: 561 Chesrnut Loop

Belluvue, ID 83313

Name of Utility Company: ID Power

Case ID: IPC-E-22-22

Comment: "Very disappointing these words from CrossborderEnergy: 'We conclude that Idaho Power's choice of assumptions and calculation methods significantly undervalue the five components (avoided energy costs, avoided generation capacity, T&D deferral, avoided line losses, and integration costs) that the utility quantified." Idaho Power please don't attempt to make it harder on people to get solar -especially in light of the effects that the status quo has on the planet."

Subject: Notice: A comment was submitted to PUCWeb Date: Tuesday, October 11, 2022 5:00:10 PM

The following comment was submitted via PUCWeb:

Name: Lyle Zufelt

Submission Time: Oct 11 2022 4:39PM

Email: zufeltco@netzero.net Telephone: 208-989-8259

Address: 9965 GRAND TARGHEE TRL

Middleton, ID 83644

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "It would be fair at this point to allow current solar panel customers to continue to receive the full Export Credit Rate for electricity generated. And the proposed change in ECR to apply to new solar panel projects. I believe you would see a drastic reduction in the number of customers willing to put out the money for solar panels. And when the situation becomes drastic and more electricity is needed than can be purchased elsewhere Idaho Power will realize how foolish and short-sighted they were in their proposal."