

From: [John Ottenhoff \(jottenhoff@gmail.com\) Sent You a Personal Message](mailto:jottenhoff@gmail.com)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Tuesday, October 11, 2022 8:52:22 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,

As a retired person living on Social Security, I'm hoping that my investment in home solar panels will not only benefit our environment but will pay off in my remaining years on the planet. Idaho Power's recent "study" is obviously and woefully biased, limited, and inaccurate in its calculations of the value of investments we homeowners have made in rooftop solar. The independent study from Crossborder Energy makes it very clear that the Idaho PUC must reject Idaho Power's proposed new rates and act in the best interest of Idaho residents--and the environment.

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,

John Ottenhoff
18226 Southlake Circle
Caldwell, ID 83607
jottenhoff@gmail.com
(208) 615-1684

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [David Whitacre \(davewhitacre@gmail.com\) Sent You a Personal Message](mailto:davewhitacre@gmail.com)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Wednesday, October 12, 2022 4:04:23 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, please, please prevent Idaho Power from ripping off those forward-looking Idahoans who are helping move us toward a livable future, by investing their hard-earned cash in home solar systems!

Idaho Power plans to take unfair advantage and pay home solar system owners far, far less than they should. Please don't let this happen.

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.

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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,

David Whitacre
5567 W. Clearview Ct.
Boise, ID 83703
davewhitacre@gmail.com
(208) 608-3373

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: [PUCWeb Notification](#)
To: [Jan Noriyuki](#)
Subject: Notice: A comment was submitted to PUCWeb
Date: Wednesday, October 12, 2022 10:00:09 AM

The following comments were submitted via PUCWeb:

Name: Jay Kanrich
Submission Time: Oct 12 2022 9:25AM
Email: richkanjg@gmail.com
Telephone: 208-585-3570
Address: 8951 New Castle Drive
Middleton, ID 83644

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "In the fall of 2019, I had a solar power company install a whole house solar photovoltaic system that was supposed to meet our average power usage each year. The system qualified for the 30% federal credit which reduced our out-of-pocket cost significantly. We are financing that remaining cost at 3.99% over 20 years. Even with the tax credit and the 1 to 1 credit from Idaho Power for generated electricity added back to the grid by our system, it is questionable whether this system will pay for itself in the long run. It was considered by me an expensive experiment. Given the year of install, this system would be considered a legacy system by Idaho Power. This system does not fully offset out entire yearly use even with changing all lights to LEDs, trying to be power miserly in our day-to-day activities, and even using window fans to pull in outside air at night for cooling to avoid using the A/C during the hot summer. The fans only work when nighttime temps drop into the low 60s, which doesn't happen much in the Treasure Valley during July and August. And during smoky days this is unhealthy and not recommended so we can't do it then, either. As a result, we still end up buying some power from Idaho Power during the winter months because our power credit built up over the summer isn't quite enough. I have contemplated adding about 10% more capacity by installing some more solar panels to my system. If Idaho Power is allowed to implement it's proposed rule that any additions to legacy systems would have to be treated as a separate, stand-alone system with its own connections and meter, and would be subject to the new variable credit rate for returned power to the grid, this would make such an upgrade economically unfeasible by any measure. It's not going to happen. This approach by Idaho Power makes no sense. Idaho Power would have to track 2 different systems with different rates at the same address. I would have 2 power bills to manage. How can they consider this as a business benefit to them unless they plan to only credit back a significantly reduced value well below the current 1 to 1 ratio for returned power on this addition? Also, if Idaho Power implements its proposal to not provide a full 1 to 1 credit for power returned to the grid from such systems going forward, these systems will even be less likely to be economically feasible for homeowners. We in southern Idaho are right on the cusp of whether these solar systems are viable given the solar generating days available through the year versus the power used for A/C in the summer and heating and other demands through the winter. There is only a glimmer of a chance this might work with a full 1 to 1 credit by Idaho Power and any upgrades do not have to be managed as separate systems. It appears Idaho Power is trying to discourage private power generation that feeds excess power back into the system for

simple 1 to 1 credit when it occurs, thus making them the only economically viable source for power in the area they service. If I was considering a solar system now as a homeowner, under the proposed rules, I would not follow through. It won't pay for itself. "

From: [PUCWeb Notification](#)
To: [Jan Noriyuki](#)
Subject: Notice: A comment was submitted to PUCWeb
Date: Wednesday, October 12, 2022 11:00:08 AM

The following comments were submitted via PUCWeb:

Name: Dorian Hitchcock
Submission Time: Oct 12 2022 10:03AM
Email: dorian.hitchcock@gmail.com
Telephone: 208-760-9270
Address: 330 S Hayes Ave
Pocatello , Id 83204

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "After examining the Idaho Power study of the value of distributed generation and recommended net metering rates, I conclude that it reveals significant short sightedness, and self interest, in their determinations. Their significant undervaluing of customer generated power will have a detrimental effect on existing customers, a chilling effect on future solar generation development, and undercut their own 100% clean energy goal. In the Idaho Power study, they undervalue the energy costs that would be avoided by increased solar generation because they use historical energy prices as a guide, which ignores the multitude of factors that are likely to push the cost of open market energy higher in the future. Their assessment of avoided generation capacity also misses the mark, in that they assume that all local solar is exported to the grid, when in reality at least half is used on-site, saving the need for additional capacity. Their assessment of deferred transmission and distribution costs assumes that the local solar would be evenly spread across the whole grid, when it is clearly the case that generation would be concentrated in the more dense urban areas of the state, so the savings are not adequately compensated for. And related to that is the avoided line losses, which were computed using a 10 year old study of average losses rather than marginal losses, undercutting the savings by at least half. And when they looked to assess the integration costs of locally produced solar, they used data from a study that completely ignored the amount of battery storage their own plans include, which would reduce the fluctuations in supply vs. demand. Idaho Power puts no value in the reduction of exposure to volatile gas prices, and completely ignore the impacts of climate change, economic growth caused by growing solar, and overall resiliency of the grid that would be increased through local generation and storage, despite the fact that they told the public in 2021 that they would include those considerations in their study. In summary, I see their study as clearly self interested, inadequate in scope, and horribly detrimental to the best interests of rate payers, consumer solar producers, the local solar industry, and puts the health and sustainability of our environment at risk. I feel that it would be a drastic violation of the Public Utilities Commission's mission to "Determine fair, just, reasonable and nondiscriminatory rates and utility practices" if you use Idaho Power's deeply flawed study to set rates without first commissioning a truly unbiased, independent, and holistic examination of the total value and benefit local solar producers have upon the grid, and for the rate payers of this state. Please do your duty, and reject Idaho Power's attempt to unfairly punish the very investments in our future sustainability that they claim to support. "

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

The following comment was submitted via PUCWeb:

Name: Jodi Marvel
Submission Time: Oct 12 2022 11:43AM
Email: jj_marvel@msn.com
Telephone: 951-719-7497
Address: 1715 N 16th
Boise, ID 83702

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "I'm concerned that Idaho Power is proposed reducing the rate it pays to residential customers with solar panels. I fully support Idaho Powers commit to provide 100% clean energy by 2045. In fact I think that time period is too generous as we are already seeing the devastating impacts of climate change. Large scale generation facilities (like the Jackpot Solar site referenced in Idaho Powers study summary) take years to get online. Residential solar panels represent an incredibly important feasible way to meet clean energy goals in a timely and efficient manner. Comparing known existing known electrical generating capabilities with a potential new source with hypothetical prices is silly and everyone should see through Idaho Powers attempt to take attention away from the real issue at hand. Idaho Power leads with the sentence, "Would you pay \$10 — or even \$5 — for something that may only be worth \$2?" to insinuate that Idaho Power is spending more on solar power than the power is worth to them, however, due to the nature of net metering, they can sell the power on the grid at exactly the same price they pay. In reality, all Idaho power is asking is a transfer in profits from the solar panel owner to themselves. I am asking you, the public utility commission sign off on this potentially devastating transfer of profits. I say potentially devastating because this will drastically reduce the incentives for homeowners to install solar panels which will increase the need for Idaho Power to burn fossil fuels to provide power for households in our state. Idaho Power is not in danger of failing to thrive, however we as Idahoans are due to climate change. Please do your part to ensure that solar panels remain a viable option for homeowners in Idaho. "

From: [PUCWeb Notification](#)
To: [Jan Noriyuki](#)
Subject: Notice: A comment was submitted to PUCWeb
Date: Wednesday, October 12, 2022 2:00:06 PM

The following comment was submitted via PUCWeb:

Name: William Carr
Submission Time: Oct 12 2022 1:20PM
Email: bill.carr89@gmail.com
Telephone: 206-200-4401
Address: 110 Highlands Dr
Sun Valley, ID 83353

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "Hello. I understand that Idaho Power will substantially cut the rate for rooftop solar power back to the grid. They are trying to cut that rate from 8-10 cents/kWh to 3.8 cents (from 8-10 cents today). An independent study set the rate at 18.3 cents. How can Idaho Power justify such a change? How can our State stand behind this change that will make solar even less affordable and reduce demand for emission-free energy?? This is unacceptable, William (Bill) Carr "

From: [Jan R Boles \(janboles41@gmail.com\) Sent You a Personal Message](mailto:janboles41@gmail.com)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Wednesday, October 12, 2022 2:10:10 PM

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Dear Idaho Public Utilities Commission,

I am considering the addition of solar panels to my residence.

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,

Jan R Boles
16371 Frost Road
Caldwell, ID 83607
janboles41@gmail.com
(208) 459-0514

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