

From: [PUCWeb Notification](#)
To: [Jan Noriyuki](#)
Subject: Notice: A comment was submitted to PUCWeb
Date: Sunday, October 30, 2022 7:00:16 AM

The following comment was submitted via PUCWeb:

Name: Kaye Turner
Submission Time: Oct 29 2022 5:06PM
Email: Kytietyner@gmail.com
Telephone: 208-233-9526
Address: 838 W. Bonneville St.
Pocatello, ID 83204

Name of Utility Company: Idaho Power Co.

Case ID: IPC-E-22-22

Comment: "I oppose the proposal by Idaho Power to stop the existing solar net-metering system. There should be no reduction in the credit given to home owner's solar energy produced for Idaho Power. The price of energy consumed should equal the price of that produced by roof-top solar. Idaho Power, at present, charges home solar owners \$62 dollars a year, even if the customer adds more power to the grid each month than is used. This should be factored in to the IPUC decision. The Voder Study claims that the solar users are not paying their fair share of maintenance and distribution costs. However, the study did not take into account the money saved by Idaho Power due to the avoided cost benefits that solar provides the network. This Includes: Avoided costs of buying fuel for large-scale utility generation (like coal or gas); 2) Avoided costs associated with finding an alternate source of power generation at high-use times; 3) Avoided costs of building new transmission and distribution lines; 4) Avoided costs associated with risk and volatility in energy prices; and 5) Avoided environmental and social costs associated with dirty energy production. If the proposal is approved it will mean Idaho Power using more carbon sources such as fuel from coal or natural gas, resulting more adverse environmental impacts across the west, including Idaho. It may, also, result in the need for costly new generating facilities and/or additional upgrading of existing facilities...both very expensive alternatives than solar. If approved by the PUC, solar home owners would be compensated at a much lower value than what they pay for electricity – making solar less attractive. Roof-top home solar systems help the Idaho Power customers, as a whole. The rate of compensation, including the net-metering system should remain at least as high as it is now. The study by Crossborder Energy found that the net-metering rate should be 14-18 cents per kilowatt power. Idaho Power and the State of Idaho should be encouraging all solar generated electricity. Thank-you for considering these comments. "

From: adambrentyoung@gmail.com
To: [Jan Noriyuki](#)
Subject: Young Family Farms - IPC-E-22-22 Comments
Date: Sunday, October 30, 2022 12:31:08 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.

My name is Adam Young, and I farm 3,000 acres of wheat, barley, and alfalfa with my parents and brother's family in Bingham County. I have read the VODER study in its entirety and have spent a significant amount of time becoming familiar with it. I am submitting these comments because I don't think the study adequately addresses the ways in which the eligibility cap, delays in program implementation, and tying the export credit rate to IRP forecasts harms irrigators. All our land is groundwater irrigated, and electricity is one of our largest expenses. In 2019, we invested in two 100kW solar projects to help offset our irrigation costs. One of these projects is located on a dry pivot corner which would have been ideal to house a much larger project, had we not been arbitrarily constrained by the 100kW limit. Ironically, our second project (which was constructed on adjacent land and on the same feeder line) required additional infrastructure on Idaho Power's part. We were required to dry up good cropland to install this second site. In other words, the 100kW cap resulted in a lose-lose situation for both our farm and Idaho Power.

The reality is that the 100kW cap is redundant and unnecessary. The net billing structure proposed in the VODER study includes a built-in disincentive for me to oversize a solar project—that is, I won't get paid for my net exports; rather, they represent a credit that I can use to offset my consumption bill. If my system is designed to produce more than I consume, then that becomes wasted capacity to me. There's my limit. And really, this dovetails perfectly with my goals as an irrigator. I'm not a PURPA facility. I'm an irrigator looking to use solar to hedge my electrical expenses. **My first request to the Commission, therefore, is to please eliminate the outdated 100kW cap, and please do so as soon as possible.**

My second request is that the Commission hold Idaho Power to their own proposal that all changes to net metering be implemented by June 2023. Every month that this gets delayed and kicked down the road represents harm to our operation. Since installing our initial systems, our farm has wanted to evaluate the option to invest in more solar, but have been unable to do so in the current state of limbo the program finds itself in. Two years ago, I testified in docket IPC-E-20-26 and asked the Commission to put some kind of sideboards or interim export rate in place so that irrigators could do the basic financial analysis needed to consider further investment. Many other farmers asked for the same thing. The Commission responded that, "We find that the claimed chilling effect on new customer participation in Schedule 84 during the interim is unpersuasive." Well, let me tell you right now, that the chilling effect was very real on our farm, and on those of every farmer with whom I've spoken. In the meantime, we have experienced power cost adjustments this year amounting to 15-20% of our total irrigation power bills. We and, in fact, the entire state of Idaho, have also missed out on bringing federal REAP funds into our state while waiting for these issues to be resolved. **Please ensure that all changes to net metering are implemented by June 2023 so that irrigators and other consumers can have the option to invest in solar and take advantage of federal grant money by fall 2023.**

Lastly, there is discussion in the VODER study regarding tradeoffs between accuracy and stability in the Export Credit Rate. Specifically, the study discusses the relative merits of Idaho Power's projected IRP rate, or a rate tied to a market index like the ICE Mid-C or the ELAP price. In my opinion, using the IRP as an estimate for avoided energy costs is not adequately accurate. The tradeoff in terms of accuracy far outweighs the purported "stability" provided by this method. It's important to remember why irrigators are investing in solar, and

what “stability” really means in that context. We’re trying to hedge our electrical costs. Uncoupling the ECR from market rates, and thus what we ultimately pay for consumption injects uncertainty, not stability, into our efforts to implement a successful hedge. So when rising market prices drive our costs up, we should expect the ECR to increase as well. Of course, the corollary is also true. **My third request, then, is that market prices, and not IRP estimates, be used to calculate avoided energy costs.**

In sum, my three requests are:

- 1. That the 100kw cap, which is harmful and redundant, be eliminated as soon as possible,**
- 2. That all changes to net metering become effective by June 2023, and**
- 3. That market prices, and not IRP estimates, be used to calculate avoided energy costs.**

There are other questions and concerns I have with the VODER study, including concerns about how Idaho Power defines and calculates transmission and distribution deferral values, discussions on valuing ECRs on a time-variant basis, which would put them out of sync with static consumption rates, and why the study’s hypothetical figures value on-peak energy at a lower rate than off-peak energy. Please keep us in the loop as these items are discussed and decisions are made.

Sincerely,

Adam Young
Young Family Farms

From: [PUCWeb Notification](#)
To: [Jan Noriyuki](#)
Subject: Notice: A comment was submitted to PUCWeb
Date: Sunday, October 30, 2022 1:00:08 PM

The following comment was submitted via PUCWeb:

Name: Karen Marker
Submission Time: Oct 30 2022 12:21PM
Email: klfmarker@gmail.com
Telephone: 208-331-0255
Address: 1008 S Glen Haven Pl
Boise, ID 83705

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "Dear members of the Idaho Public Utilities Commission (IPUC) (as directed in October 12, 2022 commission document, I will also cc: Idaho Power representatives by email) My husband and I currently participate in the Idaho Power on-site generation program and request that IPUC use its authority to direct Idaho Power to change its current compensation structure to incentivize rather than disincentivize solar power on-site generation. We also ask that such a policy change apply to all customers, not only those grandfathered in 2020. Incorporating evidence from independent third-party analyses is also essential to this action since while Idaho Power may have the best of intentions, asking the utility provider alone to analyze need and set pricing can spur distortions. We are not merely Idaho Power customers, but more importantly, among numerous citizens and organizations such as the City of Boise, making commitments to advance efforts to mitigate climate change; it is perhaps the most serious threat of our times. Few go to the trouble to put solar panels on their roofs merely to reduce energy costs, and that must be part of the conversation. We installed our first solar system—a thermal hot water system—back in 2007. And in 2022 we installed a photovoltaic (PV) system. (Had a utility company offered these options, we would have had them make such installations.) Today we are frustrated as we had hoped energy credits would offset the PV installation loan. Now our energy and loan costs far exceed what we'd been paying before. We took a risk, but feel that we are being penalized for trying to do the right thing. While we recognize a necessary balance between customer preference and business expense, every indication is that solar power will become, as the International Energy Agency recently predicted, "the cheapest source of electricity in history." (source: Beyond Catastrophe: A New Climate Reality Is Coming Into View, David Wallace-Wells, The New York Times Magazine, October 26, 2022). Given the environmental stakes and growing ease of expanding solar use, putting up obstacles to slow implementation of this renewable pathway seems at best a questionable choice for a utility company committed to cost-effective renewable use, and at worst morally dubious. And as IPUC committee documents suggest, you also share widespread concerns about the valuation methods Idaho Power has used. Thank you for this opportunity share my comment. Karen Marker 1008 S Glen Haven Drive Boise, Idaho 83705"

From: [Joan Palmer \(palmerthree@yahoo.com\) Sent You a Personal Message](#)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Sunday, October 30, 2022 8:20:28 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,

Idaho power enjoys a near monopoly in Idaho and they raise rates at will. Offering a fair rate for power generated by roof top solar panels is the least they can do. If we allow them to use their own study, without considering another study that is available and relevant, we leave everyone with a biased conclusion. Ultimately consumers will be injured by unfair business practices.

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,

Joan Palmer
51 Nelsen Ave.
Idaho City, ID 83631
palmerthree@yahoo.com
(208) 392-9677

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: [ERNIE BACHMAN \(epbachman@gmail.com\)](mailto:epbachman@gmail.com) Sent You a Personal Message
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Monday, October 31, 2022 10:53:10 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,

After reviewing the independent study conducted by Crossborder Energy, I am convinced that the Value of Distributed Energy Resource Study, conducted by Idaho Power, undervalues the benefits of residential solar installations in the State of Idaho. I am urging the Idaho Public Utilities Commission to consider the results of the Crossborder Study, when determining the fair compensation rate paid or credited by Idaho Power to local solar owners for net generation. All the benefits of net metering should be considered, and the installation of expanded residential solar encouraged.

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,

ERNIE BACHMAN
916 N. 20th St
Boise, ID 83702
epbachman@gmail.com
(208) 513-9660

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: [Frank Piatek \(frankiep222@live.com\) Sent You a Personal Message](#)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Monday, October 31, 2022 2:40:14 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,

I think if you the PUC put out a study I would want a third party to do one as well to show exactly what this shows. How far off you guys are and how do we fix that. I can easily get rid of my solar if if the system is going to be rigged into the PUC favor.

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,

Frank Piatek
77 S Inverness Dr
Nampa , ID 83651
frankiep222@live.com
(425) 698-3961

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: [Eric Gray \(eric@graycondo.us\) Sent You a Personal Message](mailto:eric@graycondo.us)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Monday, October 31, 2022 2:55:25 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 Solar this Spring and it has changed our monthly costs dramatically. As a retired couple on minimal income (with raising prices everywhere) our investment in Solar was to help fix our costs by generating our own electricity.

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,

Eric Gray
2914 South Brandenburg Avenue
Eagle, ID 83616
eric@graycondo.us
(925) 623-5979

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: [Robert Cochems \(robcochems@gmail.com\)](mailto:robcochems@gmail.com) Sent You a Personal Message
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Monday, October 31, 2022 3:00:14 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,

Don't change net metering. I made an investment based on the current rules.

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,

Robert Cochems
6165 E Canyon Crossing Dr
Nampa, ID 83687
robcochems@gmail.com
(208) 571-4895

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: [Amanda Peabody \(ajreece12@yahoo.com\) Sent You a Personal Message](mailto:ajreece12@yahoo.com)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Monday, October 31, 2022 3:02:52 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,

With the growing cost of living and the lack compatible wages to equal that out. This is a topic of discussion that needs to be fully studied. I think It's beneficial to have solar for everyone involved, and if there are decisions are being made about it's usage and savings, there should be a thorough and complete study on the matter. At the very least.

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,

Amanda Peabody
9637 Pump Rd
Nampa, ID 83686
ajreece12@yahoo.com
(208) 921-9675

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.