

IPC-E-22-22

David Chamberlain

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2022 NOV -4 PM 4: 52

IDAHO PUBLIC
UTILITIES COMMISSION

Summary

I oppose this proposal, but I do have some alternative proposals

My Solar Experience

Zi am new to solar. Not an expert at the system, the lingo, and Idaho Power financials. I want to share my experience and some of what I think is missing from the proposal, thoughts about the IRP and some alternative proposals.

TABLES & CHART

I installed a 10.8 kwh nameplate system last January (2022)with the hopes it would cover most of my annual needs. Given the current monthly netting system and the 1:1 kwh carryover that hope has been realized.

Table 1

The first table shows my monthly generation, my monthly net amounts and the growing or shrinking carryover. From March to June I had accumulated just over 2000 kWh that then were used in July and August. Favorable Sep results will help offset low Oct/Nov solar generation.

Bar Chart

The chart shows my entire 9 months of power generation so far. The 10.9 Mwh of total generation is sliced by the hour of the day. Note my entire system is west facing. The blue bars are the power generation. You can see the bulk of our power generation is between 1 and 6 PM. That's precisely when I use the least power, except for late afternoon 'AC in July & August.

Given the timing difference between generation and usage, I end up generating each hour what Idaho Power calls Excess Energy. These are the Red bars. These are the excess Kwh sent to the grid. This is the effect of real time measurement in the VODER study..

Table 2

The last table shows this same 10.9 Mwh separated into it's monthly buckets. You can see in the total column that 58% of the 10.9 Mwh generated over 9 months that 58% of the power generation would be "EXCESS" and subject to the lower rate if this is the measure (real time netting) is approved.. In some months, like May, this EXCESS is 77% of total production. Even in July, 29% of the generation is "EXCESS" because of the timing difference.

The yellow bars are the effect of Hourly Netting. The negative bars in the middle are the hours where I am generating a net surplus and is subject to the lower ECR rate. This last Table shows This would be 46% of the overall solar power generation (total column.) In the month of May it would be 73% of production - not far from the Real Time netting number.

The last lines of this table show the amount of "EXCESS" hours if the "Netting" were done on a daily basis - NOT hourly or real time. I don't love this option but it would be a compromise that is worth considering.

IMPACTS OF THIS PROPOSAL

I strongly believe in at least results of this proposal as it presented.

- 1) If adopted as is, this proposal will quickly kill the residential solar industry. Many analyses show current payback in the 9-12 years. This is marginally acceptable because of my interest in helping the environment. This proposal makes those payback years double or triple depending the measurement and final ECR adopted. A 20-30+ yr payback is totally outside any reasonable range and will be rejected every time.
- 2) This proposal will drive behavior change for residential players. A behavior change this is diametrically opposed to the behavior Idaho Power wants. You tell me what the measures are and I will adapt as best I can to maximize my benefit. I will shift my dishwashing, my laundry and other power hungry activities to the 1-6 timeframe when I generate excess power. In the summer I will supercool my house in those peak hours so that I use my own power. I will hope it then relieves my use of expensive GRID power later in the evening/night. That is precisely what Idaho Power doesn't want. They are offering \$20 to their customers who will relinquish control of their thermostat in the summer and live with slightly higher temperature in order to conserve power during peak hours and help Idaho Power avoid interruptions or blackouts. This proposal completely screws up the incentives for the behavior Idaho Power wants. If one person does this you may say we don't care. What if 10,000 of us did it, would you care. Idaho Power we are being subsidized by non-solar customers. Maybe. Is it a material amount? Maybe. But they can't claim we are a significant size and problem in terms of subsidization, but then ignore any downside impacts because of immateriality. Either we are big enough to matter or we are not. Beware of their selectively choosing to add or ignore benefits and risks.

MISSING ELEMENTS IN THE PROPOSAL

FIXED COSTS

Idaho Power says 65% of costs are fixed. I believe them. I was in the accounting field for Hewlett Packard for my career. I get that's its complex and I don't pretend to understand the utility business. But I did hope to see more analysis that might lead to a potential new fixed cost element of my bill instead of a variable rate change tied to my kWh usage. Instead of a variable rate change, why not for example - charge

45 for a 1-5000 kWh system, \$10/month for a 5001-10000 kWh system, \$15/month for a 10,001 - 15,000 kWh system. Whatever the numbers might be. I may not like it any better, but I had hoped to see it.

ENVIRONMENTAL IMPACT

I think the whole environmental benefit/cost analysis is missing. Idaho Power acknowledges its not there and felt they didn't have a mandate or data to do it properly. On the surface you might be disappointed but forced to accept this argument. However, if you look at Idaho Power's 2021 IRP there are environmental considerations everywhere. For example on page 127 of the 2021 IRP there is a 20 year Carbon Price Forecast. All the trade-offs, costs, benefits, timing, risks of shutting down the Bridger facility, consideration's for all the oil and gas fed power utilities, how to get to 100% clean energy by 2035 or 2045 are included in the IRP. All these are valid questions and valid analyses that Idaho Power wrestles with. They can do it for residential solar they just didn't. In the whole 200+ pages in the IRP, the residential solar business (benefits, risks, problems, issues, etc) is given a few paragraphs at best. You would think Idaho Power is either ignoring it, doesn't care, or intends to quietly kill it. A different vision of it is needed. And a real wrestling with the environmental issues.

CLEAR COST NUMBERS FOR HYDRO, WIND, SOLAR, COAL, GAS, THERMAL COMPONENTS

I had asked IP employees for a cost comparison between hydro, coal, gas, wind, solar in various forms, etc. Then only thing I could get was a reference to the IRP. I did find on page 109 something. Im not sure how to interpret things on it I won't. But it did make me wonder about 2 related things.

- a) The 2 cent statement that go around for solar - what is the source of that.
- b) They talked about cost avoidance, but did they talk about cost reduction? What if they could get out of the coal and gas businesses sooner rather than later? Could residential solar help accelerate this transition.
- c) Biomass, small nuclear, and geothermal don't look cheap. Could residential solar replace them?
- d) Maybe the answers to these questions are obvious, but they weren't to me. Some straightforward disclosure of costs would help.
- e) Even with its time of day, day of week, or seasonal complexities.

IDAHO POWER AND 3RD PARTY SYSTEM PROVIDERS COMMUNICATION ISSUES

Last, I want to comment on the communication of both industry providers and Idaho Power. We finally had sit down meetings with 2 providers about a year ago. One never brought any of this up - that a study was being done and we wouldn't be grandfathered in. The second and the one we went with, did a kind of a "oh yeah, you wont be grandfathered in, but don't worry about it." Likewise the Idaho Power states they "supports solar and customer choice." What is that? Let's be clear this proposal, if adopted, with a real time or hourly netting measurement

and a 2-4 cent ECR will kill the residential solar market here unless panel and installation costs also drop in half. The surgeon general supports personal choice also but he also slaps a label on every cigarette package saying it could kill you. IP should have a visible warning on its home page saying residential solar is bad for your financial health. It will never payback. Industry partners should get a signed waiver saying the buyer understands. Admittedly, I did not do enough homework. It was on the edge for me and we decided to do it for our world' sake. Would I do it today. Absolutely not.

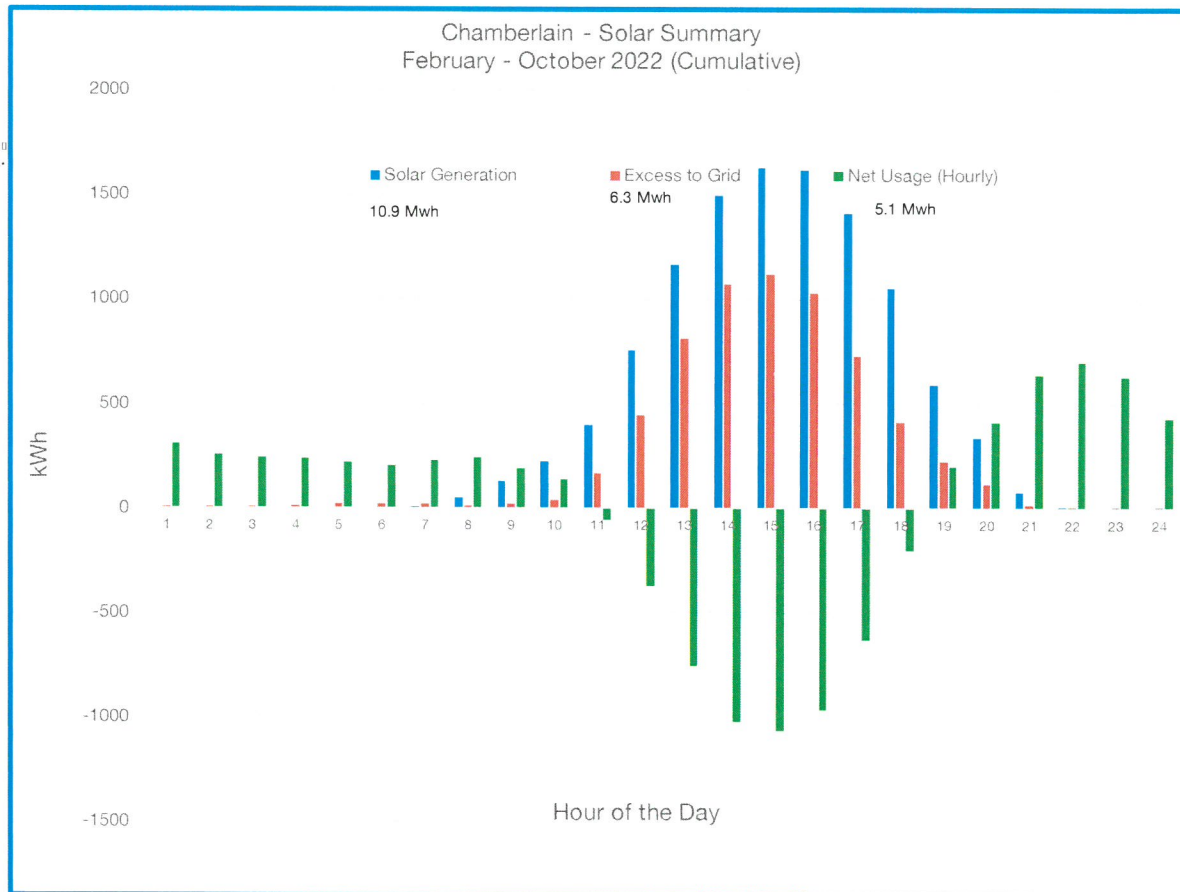
They all need to be clear about risk, etc.

ALTERNATIVE PROPOSALS. I think there is a solution somewhere. And this ain't it.

- 1) Scrap the proposal and get a 3rd party to do one.
- 2) Get a new team to make a proposal. Start with a very different vision. Get a team from Idaho Power, 3rd Party Solar Providers and a citizen group (solar & non solar) together to be locked in a room for 6 months and come out with a solution that is acceptable to everyone. This is our planet, our homes, our livelihoods, etc. We can make this work.
- 3) Perhaps do both 1 & 2 together.
- 4) If some version of this proposal is accepted, please grandfather a second group. Anyone who installed between Dec 2019 and the decision date around this proposal should be grandfathered into the current system. Perhaps for a period of 10 years, not 25 like the first group. That allows for a recovery of at least a substantial portion of the investment.
- 5) Consider additional measurement options such as daily netting (easily done) or Fixed Cost billing fees and mechanism rather than messing with the variable rate per kwh. This however will require additional analyses and approval.

Chamberlain - Solar Generation & Monthly Net Carryover
March-September 2022
(10.8 kWh nameplate, All West Facing)

kWh	February	March	April	May	Jun	Jul	Aug	Sep	Oct
<u>Actual Results</u>									
Solar Generation	713	1,012	1,240	1,431	1,579	1,717	1,351	1,076	806
Monthly Net kWh	84	-200	-405	-769	-705	1,217	908	-291	170
Cumulative carryover	0	-200	-605	-1,374	-2,079	-862	0	-291	-121 (est.)



Chamberlain - Solar Summary
March-September 2022

	February	March	April	May	Jun	Jul	Aug	Sep	Oct	Total
<u>Actual Results</u>										
Solar Generation	713	1,012	1,240	1,431	1,579	1,717	1,351	1,076	806	10,926
Excess to Grid (Real Time Netting)	452	682	827	1,096	1,111	498	402	718	495	6,283
Hourly Netting	-424	509	765	1,045	1,050	313	242	671	455	5,061
<u>Impact of Proposal</u>										
Real Time as % of Generation	63%	67%	67%	77%	70%	29%	30%	67%	61%	58%
Hourly Netting as % of Generation	-59%	50%	62%	73%	67%	18%	18%	62%	56%	46%
<u>Alternative Proposal</u>										
Daily Netting	15	208	418	745	727	45	18	301	23	2,462
Daily Netting as % of Generation	2%	21%	34%	52%	46%	3%	1%	28%	3%	23%

Nov 3, 2022
IPC-E-22-22

David Chamberlain

Experience, observations, Comments on Proposal

1. Tables & Chart – Experience with a 10.8 nameplate system. Good. But the impact of the proposed measurement options and the rate range being talked about are devastating. If approved it will
 - a) Kill the residential solar industry
 - b) Change behavior for current system owners to maximize results
2. Missing elements from Idaho Power's analysis.
 - a. Fixed cost billing option
 - b. Cost comparison across categories.
 - c. Environmental cost analysis. Non existent in this proposal, but is frequently referenced in the IRP.
 - d. Bias comes through. Residential solar is barely mentioned in iRP
3. Idaho Power and Industry providers were not and are still not clear or genuine about their communication, the risks, the proposals

Alternative Proposals

1. Grandfather a second group into the current arrangement of 1:1 kwh with carryover. Those who installed between Dec 20, 2019 and the upcoming IPUC decision date or the VODER filing date for a period of 10 yrs (not 25), to allow some financial recovery.
2. Consider alternative measurements (daily netting - a compromise) and billing mechanisms (Fixed Cost fee structure) rather than rate changes,
3. Change paradigm and try again. How can we take advantage of huge interest and make this a win for everyone. Lots of rooftops. Lots of interest.

From: [Alison Ward \(ward.m.alison@gmail.com\) Sent You a Personal Message](mailto:ward.m.alison@gmail.com)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 4:19:50 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 protect our ability to add more solar by protecting solar rates, as well as considering proposals to increase the KW capacity of arrays. Our communities see solar as part of the path forward for a healthy future for all.

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,

Alison Ward
1003 N. Garden St.
Boise, ID 83706
ward.m.alison@gmail.com
(208) 610-3671

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: [Richie Thomas \(richiet@hotmail.com\) Sent You a Personal Message](mailto:richiet@hotmail.com)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 4:20:49 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 Idaho resident, we should use all the means to better our economy and lifestyle. This includes being environmentally conscious thereby leading to the betterment of future generations. Many Idahoans including me have started moving towards this goal by using renewable resources and one of the cheapest and clean energy resource is Solar. The Treasure Valley gets an average of 210 sunny days per year and we need to harness this resource as much as possible. This study by Idaho Power is a biased report and does not consider the benefits of solar energy. It does not provide an incentive for residents to move to a cleaner source of energy. This study is focused at their monetary benefits in the short term, and no thought has been put to the long term benefits to the community.

Any study must be peer-reviewed by other energy companies (including solar companies) as well as residents. This Solar study report must be rejected.

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Sincerely,

Richie Thomas
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(208) 321-8067

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: [JOHN ALLEN \(JWALLEN@BOISESTATE.EDU\) Sent You a Personal Message](mailto:JOHN.ALLEN@BOISESTATE.EDU)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 4:34:00 PM

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Dear Idaho Public Utilities Commission,

After reading parts of the comprehensive Crossborder Energy report, with its comments about Idaho Power's use of outdated data, poor choices for modeling and omission of important facts, I request that you reject Idaho Power's study.

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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Sincerely,

JOHN ALLEN
2972 E PARKCENTER BLVD APT 513
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JWALLEN@BOISESTATE.EDU
(208) 344-4565

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: [Helen Husband \(mommail@mail.com\) Sent You a Personal Message](#)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 4:34:06 PM

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Dear Idaho Public Utilities Commission,

A study by a power company is NOT going to be unbiased. Independent studies should only be ones considered.

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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Sincerely,

Helen Husband
2163 Dakota Ln
Ammon, ID 83406
mommail@mail.com
(209) 610-8346

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From: [Roy Bossert \(broy2875@gmail.com\) Sent You a Personal Message](#)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 4:37:51 PM

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Dear Idaho Public Utilities Commission,

At this time Idaho consumers need all the incentives possible to switch to solar energy. I believe that rooftop solar makes the most sense as available tracts of land for solar farms become more costly and difficult to secure. Many people I know are presently waiting to see what the outcome of this decision will be before committing to solar projects.

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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Sincerely,

Roy Bossert
23 Bossert Rd.
Salmon, ID 83467
broy2875@gmail.com
(208) 310-1303

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: [Heather Steele](#)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22
Date: Friday, November 4, 2022 4:38:43 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.

To Whom It May Concern:

Thank you for the opportunity to provide comments on Idaho Power's request to change its compensation for net-metered rooftop solar systems.

My husband and I are Idaho Power customers who installed our rooftop system in late 2019. We are fortunate to have been grandfathered into the 1-to-1 compensation for excess energy produced by our system. We are delighted to be able to both stabilize our electric costs and, perhaps more importantly, reduce our contribution to the greenhouse gases that are fueling climate change.

If Idaho Power gets its way in drastically reducing the compensation for home-generated power, it will negate current incentives for people like us to install their own systems and slow our progress toward a clean energy future. This change would be a detriment to our neighbors, our community, and ultimately our planet.

We support citizens' ability to generate their own power in a way that is economical and has a reasonably short payback period. For this to be feasible, we need the **partnership** of the power company, not its opposition. Idaho Power's proposed scheme would lengthen the payback period to an extent that it might exceed the life of the solar system, if not also the life of the homeowner. Many fewer homeowners would be willing or able to make the substantial investment in a rooftop solar system under these conditions. In turn, solar installation companies and their employees would suffer. On a personal note, we have considered the possibility of expanding our system in order to be able to power an electric vehicle. The reduction in compensation would threaten our ability to afford such a project.

As home power generators, we support the capacity and resilience of the power grid for our neighbors and Idaho Power. We produce excess energy at the time of year when it is most in demand and expensive to deliver, and thereby relieve some of the pressure for Idaho Power to expand its own generation capacity. In this way, we feel we have greatly benefitted the company without its having to pay US a single penny. It is only fair that the company compensate rooftop solar owners for the expensive energy we contribute during the summer on a one-to-one basis with cheaper energy during the winter.

Finally, I don't need to reiterate the impassioned statements at last night's meeting about the threats of climate change and the dire consequences of inaction, other than to say that the predictions are absolutely terrifying. I urge you to consider your critical role and opportunity in pushing our state toward a meaningful reduction in greenhouse gases. It's in your hands to compel Idaho Power to act as a partner to rooftop owners and a proponent to clean energy development for our collective greater good.

With respect and thanks,

Heather Steele

From: [Randy Smith \(brsmithintf@yahoo.com\)](mailto:brsmithintf@yahoo.com) Sent You a Personal Message
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 4:38:50 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,

Hello. Thank you for reading my comments. Residential solar power (RSP) needs a boost, not a take down. Idaho Power's latest study severely under values RSP. RSP is a critical component of our society's transition to renewables as our main sources of power. RSP uses building footprints already in place, helps the grid during peak power use times, helps citizens be part of the solution, reduces need for large transmission lines, and is an insurance policy from damage due to climate change. In order to identify the true value of RSP, a full, comprehensive accounting of ALL its benefits needs be included in studies done. Idaho Power's study falls short of the full accounting thus vastly underestimates the true value of RSP. Please, please, please take this to heart as you consider your next action surrounding this issue. For our kids' sake and future generations to come, make the best choice for Idaho by embracing the economics that will result in more RSP, not less!

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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Sincerely,

Randy Smith
2651 E. 4000 N.
Twin Falls , ID 83301
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(208) 308-3535

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: [Melody Lenkner \(melodylenkner@yahoo.com\) Sent You a Personal Message](mailto:melodylenkner@yahoo.com)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 4:40:06 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 members of the PUC, it is your job to keep electricity affordable and regulate the monopolies in our state. When you make your decision it is incumbent on you to look at the bigger picture of climate change and affordable energy as opposed to what is best for Idaho Power's profit margin. In fact the more solar energy that is generated by customers the more Idaho Power can focus its energies on projects of green energy.

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Sincerely,

Melody Lenkner
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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: [Elizabeth Dyrsmid \(fresh.vision.coaching@gmail.com\) Sent You a Personal Message](mailto:fresh.vision.coaching@gmail.com)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 4:40:15 PM

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Dear Idaho Public Utilities Commission,

Investing in solar should be adequately rewarded.

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Sincerely,

Elizabeth Dyrsmid
2208 N 19TH ST
BOISE, ID 83702
fresh.vision.coaching@gmail.com
(208) 761-9873

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From: [Leigh Ford](#)
To: [Jan Noriyuki](#)
Cc: [Jeromy Cross](#); [Ava Traverso](#)
Subject: #IPC-E-22-22
Date: Friday, November 4, 2022 4:44:56 PM
Attachments: [#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 Secretary,

Please find attached the comments of Snake River Alliance for #IPC E-22-22.

Thank you for hosting three hearings as well as for the opportunity to comment.

Leigh

Leigh Ford (she/her)

Executive Director

Snake River Alliance

[On Shoshone and Bannock land](#)

(208) 297-3614 (cell)

(208) 344-9161 (office)

snakeriveralliance.org

Do Not Be Afraid Of Work That Has No End

~Avot de Rabbi Natan~



Snake River Alliance

PO Box 1731

Boise, ID 83701

[On Shoshone and Bannock land](#)

November 4, 2022

Snake River Alliance comments on #IPC-E-22-22

The Snake River Alliance has been Idaho's nuclear watchdog for over 40 years. We represent thousands of southern Idahoans who live, use, and enjoy the natural beauty and resources that Idaho has to offer. We must stand with current Idahoans who want to save money and resources, cut our carbon footprint, free our waterways, and clean up our air. We also stand with future generations, which should have a fighting chance.

Idaho Power's VODER study is biased and heavily favors the corporation. The study analyzed five components; avoided energy costs, avoided generation capacity, T&D deferral, avoided line losses, and integration costs. The VODER study consistently undervalued all five categories in Idaho Power's favor.

The bias is even more blatant in what the study omits. Idaho Power agreed to look at several environmental benefits of solar in their assessment, and they chose not to. Idaho PUC Order No. 35284 directs the study to analyze "benefits that are known and measurable, will impact rates, and will benefit Idaho ratepayers and citizens." Idaho Power chose to disregard the order while at the



same time advertising its green energy programs and peddling clean energy goals.

Idaho Power is putting its profits over our climate. Idaho Power wants to reap all the benefits of one's personal solar panels without helping with the costs of buying and maintaining the equipment. There need to be fair and transparent rules around rates so that people do not feel cheated and solar development is not impeded.

Disincentivizing solar not only affects those who already have it but also dissuades people from investing in solar in the future. The ripple extends to small businesses and communities. The solar industry provides good, local jobs for many people in communities across the state.

For all these reasons, the Snake River Alliance urges the Idaho PUC to look out for the interests of Idahoans and consider the Crossborder study. The Crossborder study is a much fairer analysis of the actual value of solar.

Thank you for the opportunity to comment.

Snake River Alliance

Submitted by Leigh Ford

Executive Director

From: [Vince Lavorante](#)
To: [Jan Noriyuki](#)
Subject: Comments
Date: Friday, November 4, 2022 5:01:37 PM

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I tried posting online but it may have not gone through.

I was at the hearing last night and was impressed how well informed the speakers were with their comments. There were many comments made that made a lot of sense to justify the position that the solar power generators (as myself) should not be penalized by not receiving full credit for excess power generated. Idaho Power should not be our enemy but our ally in the great cause of generating clean energy. I got into this program not to make a profit but hopefully to at least recoup my investment and doing my part as a Idaho resident and trying to be a responsible person and do what I can to help reduce pollution and help the environment. I have actually got excited about seeing the daily data as far as being able to generate clean power and this has encouraged me to attempt to balance my usage to my production and in the end reduce my energy usage. My allowing IP to reduce my credit value would be a discouragement to more solar power customers when we really need more to help our environment. Please do not allow this to pass. Regards Vince Lavorante IPC-E-22-22

From: [Sheree Welshimer \(shereewelshimer@hotmail.com\) Sent You a Personal Message](mailto:shereewelshimer@hotmail.com)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 5:03:31 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,

Sheree Welshimer
5320 E. Lewis Lane
Nampa, ID 83686
shereewelshimer@hotmail.com
(208) 899-9397

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: [Kathleen Walker \(kathleenwalker173@gmail.com\)](mailto:kathleenwalker173@gmail.com) Sent You a Personal Message
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 5:07:31 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 needs to make solar energy production through solar panels available to customers in a way that is affordable and fair. To me this means that we have the ability to bank our solar production for the snow months. It means that our skies remain clear. It means that our beautiful state will stay that way for our children and grandchildren.

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,

Kathleen Walker
551 Docs Hickory DR
Hailey, ID 83333
kathleenwalker173@gmail.com
(208) 720-4461

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: [Pamela Bly \(pambly1@gmail.com\) Sent You a Personal Message](#)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 5:12:35 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 rivers running lower every year ?. Why wouldn't we look for alternative sources of energy before our existing systems are in crisis mode.

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,

Pamela Bly
2334 S. Swallowtail Ln.
Boise, ID 83706
pambly1@gmail.com
(208) 385-9875

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: [Melissa Ruth \(melissabr32@gmail.com\)](mailto:melissabr32@gmail.com) Sent You a Personal Message
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 5:15:00 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,

Solar is a huge part of our future. Please insist on accurate data and help move solar forward.

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,

Melissa Ruth
910 E Washington
Boise, ID 83712
melissabr32@gmail.com
(208) 841-1704

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: [Elizabeth Roberts](#)
To: [Jan Noriyuki](#)
Subject: Net-metering rates for customer-generated solar should not be lowered
Date: Friday, November 4, 2022 5:18:50 PM

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Elizabeth Roberts
nodawaykid@gmail.com

I am an Idaho Power Customer.

Thank you for the opportunity to comment on case #IPC-E-22-22.

Idaho Power should not be allowed to reduce solar net-metering rates for customer-generated power. The study they presented to the Commission is flawed because it understates the value of power provided by rooftop solar owners.

Idaho Power failed to fully consider the value of grid stability and resiliency, the value of reduced pollution on public health, and the value of local jobs in the solar industry.

Fewer customers will choose to install new rooftop solar if you allow Idaho Power's new rates. In order to avoid the most severe consequences of climate change, we must transition to clean energy sources like solar as quickly as possible. More rooftop solar adoption will help us achieve this goal.

The Idaho Public Utilities Commission should not accept Idaho Power's request to lower solar net-metering rates.

From: [Susan Ward \(deedward@msn.com\)](mailto:deedward@msn.com) Sent You a Personal Message
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 5:20:10 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 need a fair study to determine fair rates. Solar owners are helping 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,

Susan Ward
5913 N Cobbler Ln
Boise, ID 83703
deedward@msn.com
(208) 631-1944

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: [Christina Veloz \(happydogandcatbuddies@gmail.com\)](mailto:happydogandcatbuddies@gmail.com) Sent You a Personal Message
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 5:25:41 PM

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Dear Idaho Public Utilities Commission,

Dear IPU

I encourage you to consider the families and communities in Idaho that need support and assistance to continue to live in this great state....and one of those resources is local solar ownership. You need to continue to work with all parties to utilize solar energy for the health and sustainability of our natural resources. Thank you!

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,

Christina Veloz
2462 N. Locust Grove Rd.
Meridian, ID 83646
happydogandcatbuddies@gmail.com
(206) 396-1192

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 Lane \(oriole-pencil0a@icloud.com\) Sent You a Personal Message](#)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 5:41:05 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,

Seems like compensating private citizens for solar in a fair manner would be a better idea than defacing our desert with a less reliable wind source from an out of state investor. In the current cycle of our climate, alternatives to a hydroelectric system is a crucial measure to ensure our increasing consumptions. Solar power isn't a cheap investment nor maintenance free. I hope we can go back to the drawing board and agree on a fair compensation plan for those investing in the future of our grid, community and industry.

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 Lane
745 Beta Cir
Twin Falls, ID 83301
oriole-pencil0a@icloud.com
(208) 316-3288

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: [Crystal Rain \(crystal.m.rain@gmail.com\)](mailto:crystal.m.rain@gmail.com) Sent You a Personal Message
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 5:54:14 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,

My name is Crystal Rain and I am an Idaho Power customer living in Garden City.

I am extremely concerned with the cost-benefit study put forward by Idaho Power. It is biased, uses out of date data, lacks public input, and does not take into account very important environmental factors.

We don't have a lot of time to mitigate the large, widespread impacts that climate change will bring to the planet. None of us can escape the damage that's coming but we can lessen it. Rooftop solar and other assorted distributed, renewable power sources or a key factor in that mitigation.

Please seriously consider the independent study conducted by Crossborder Energy which outlines those shortcomings. We deserve solar rates based on a more fair and complete analysis.

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,

Crystal Rain
3816 Kay Street
Garden City, ID 83714
crystal.m.rain@gmail.com
(425) 306-0371

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: Friday, November 4, 2022 5:00:08 PM

The following comments were submitted via PUCWeb:

Name: Lou Evans
Submission Time: Nov 4 2022 4:47PM
Email: louevansjr@gmail.com
Telephone: 408-421-9029
Address: 6043 S Rising Sun Way
Boise, ID 83709

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "I'm here to advocate for our current net metering system to stay at a 1:1 ratio. That means one kilowatt hour sent to the grid should always get no less than one credit afforded to the owner of a solar system. Solar Companies have been working with Idaho Power for years, helping alleviate the strain on the grid by their solar customers sending their excess generated energy to the grid powering their neighbors homes. This has helped to stop the rolling brown outs and black outs throughout the State of Idaho. Pecking away at that ratio devalues the homeowner's (solar panel owner's) incentive to own their power. Idaho Power knows this. There are well over 600,000 Idaho Power customers throughout the state. All of them already have been contributing to Idaho Power's renewable energy ventures through the "Energy Efficiency Services" fee on their bill every month. The unfortunate part about that is Idaho Power customers only receive a tiny fraction of that generated power they help fund, and the vast majority of that power goes to states like California for which Idaho Power has a contract with. There is no way to justify this proposal where the solar panel owners and solar companies are incentivized. This is greed disguised as logic. Please consider dismissing this proposal. Doing so will keep current solar customers satisfied, future solar customers incentivized, and hard-working solar companies thriving. Thank you."

Name: miers johnson
Submission Time: Nov 4 2022 4:00PM
Email: miersjohnson@yahoo.com
Telephone: 208-880-0479
Address: 14500 lewis lane
nampa, ID 83686

Name of Utility Company: idaho power

Case ID: IPC-E-22-22

Comment: "it is unfair for those of us that have invested in clean and renewable energy to have our generation reimbursement reduced or eliminated. It was a large outlay on our part. It

is a benefit for our state and country to use renewable resources such as solar and wind .Their use should be encouraged especially now that more electric cars will be entering our grid"

Name: Lon Stewart
Submission Time: Nov 4 2022 4:52PM
Email: afreeeagle@yahoo.com
Telephone: 208-841-3929
Address: 3477 N Shadow Hills Dr
Eagle, ID 83616

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "Idaho Power's VODER study inaccurately characterizes some of the assumptions made in the study in Idaho Power's favor for reducing compensation to homeowner's creating their own power from solar arrays. Idaho Power has committed to being 100% clean energy by 2045. They believe in the value of solar energy as evidenced in their Jackpot Solar generation facility, however they are unwilling to support distributed solar generation by customers in their distribution area by valuing this energy at rates greater than 50 % less than current pricing. This indicates they are more interested in their shareholders than their customers. As a public utility, it should be the other way around. How much energy is lost back into the environment from line losses transporting the energy from Jackpot Solar or along the Hemmingway to Boardman line. This is lost revenue to Idaho Power. How many customer generation sites could be built to compensate for this lost energy/revenue. Idaho Power could help pay for some of these systems and still come out ahead with good public relations and revenue. Customer generated electricity helps avoid the cost of constructing and operating a new power plant for peak shaving. Idaho Power's peak demands are summer afternoons when the sun is shining and customer's solar arrays are creating maximum output thus helping to minimize the peak electrical usage. This sounds like a win-win situation. Idaho Power could help pay for customers' installations and compensate electricity to the grid at more favorable rates and still come out money ahead as compared to constructing and operating a new generation facility. Customer generated electricity allows customers the opportunity to be part of the solution for creating green energy. The customer puts up all the money for the installation of their system, but Idaho Power does not see fit to recognize the value to their system. Idaho Power's VODER study created by Idaho Power is not an independent study. They may know their system better than a consultant but they aren't necessarily able to fairly able to calculate all of the avoided costs. I urge you to reject the VODER study and use the independent third party study by Crossborder Energy who has created a more complete and fair cost analysis for customer generated solar power to all Idaho Power rate payers. Thank you for your consideration. Lon Stewart 3477 Shadow Hills Dr Eagle, ID 83616 I am an Idaho Power customer. "

Name: Shawn Nield
Submission Time: Nov 4 2022 4:00PM
Email: shawnnield@gmail.com

Telephone: 307-251-7142
Address: 7657 Gillis Rd
Boise, ID 83714

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "As regards case IPC-E-22-22 I'd like to make a few points. First, rooftop solar generators are responsible citizens, concerned about energy security not only for themselves but for their communities and this country. At their expense they are benefiting the resiliency of the electrical grid, mitigating carbon emissions, and contributing to clean air for their fellow citizens. Accepting the conclusions of Idaho Power Company's (IPC) study and letting them set the compensation rates to solar power generators would serve as an insult to responsible citizens that are risking their own resources to truly make a difference. As far as the study is concerned, I do find it very readable and explanatory. I do not, however, believe that it entirely addressed the concerns of the commission, nor did it properly value the energy contributions of residential solar. You're probably tired of hearing about the critique prepared by Crossborders Energy but it appears they make multitudes of valid points that create serious doubt about the IPC study being "fair". After all, IPC stands to benefit handsomely at the expense of well meaning responsible citizens like myself if it gets its way. It's hard not to read that critique and the credentials of the authors behind the Crossborders study and come to the conclusion that IPC is being egregiously disingenuous. In closing, I'd like to thank the folks at the PUC for their hard work and I recognize the seriousness of their charge of doing what's best for the public. I attended the meeting on the 3rd but was unable to stay long enough to get up and speak. I hope this will suffice. "

Name: Jason Jenkins
Submission Time: Nov 4 2022 4:14PM
Email: jay@idahomesolar.com
Telephone: 208-861-5662
Address: 11120 W Bodley Dr.
Boise , ID 83709

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "I currently work in the solar industry. I think Idaho Powers study is unfair to the individual home owner that invest their own money into solar. The buy back ratio is just pure greed and only benefits the utility Idaho Power. We are all in this together and power generation is going to become an issue in this valley and surrounding area if we do not work together. The growth this valley is going to see over the foreseeable years is massive and if Idaho power gets their way it will make it much more difficult for homeowner to make the investment into solar. That will lead to massive increases in our energy expenses as Idaho power will be forced to purchase power from further sources. Thus increasing cost to the end consumer. I love what I do for idahoans and helping them feel like they are part of the solution to the energy demand that is increasing at one of the most rapid rates in the nation. I have lived in this valley for 21 years and have seen the changes here. It is no secret that this valley is one of the fastest growing populations in the nation and has been for years. I would like to think that we all work together to help generate a safe, and energy efficient power grid for this area. It's hard to read the report that Idaho Power has proposed and feel like they want to be a part of the team. "

Name: Nancy Parker
Submission Time: Nov 4 2022 4:10PM
Email: npgardener55@gmail.com
Telephone: 208-724-0348
Address: 25962 Emmett Road
Caldwell, ID 83607

Name of Utility Company: Aspire Human Services

Case ID: IPC-E-22-22

Comment: "I ask the commission to consider outside, unbiased studies of solar value. Crossborder Energy did a thorough analysis. Those of us who have invested our own money to reduce strain on the grid should be paid market rates."

Name: Jim Armstrong
Submission Time: Nov 4 2022 4:26PM
Email: armstrong.jandg@gmail.com
Telephone: 208-484-0073

Address: 1122 E Locust Lane
Nampa, ID 83686

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "Comments Concerning Idaho Power's Voder Study I have been a Residential Service, On-Site Generation customer of Idaho Power since June 2021. My system (7.2 kW) was designed to produce sufficient energy to satisfy my annual energy consumption based on monthly net metering and the exporting of excess net energy as described in the current Schedule 6 rate structure. Yes, I was told by Idaho Power that Schedule 6 was subject to changes in the future which could effect multiple areas dealing with compensation for exporting excess energy generated by my system. But, I had no indication that such changes could be so drastic as those proposed in the Voder Study. I read the entire Study (many sections were quite difficult to grasp and understand since I am not a power plant and distribution electrical engineer, lawyer, or statistical actuary) but I was able to comprehend its effect based on page 109 of the Voder Study. My compensation for net excess energy could be approximately a whopping 75 to 80% reduction per kWh. This type of reduction would negate most of the reasons for becoming a Residential Service, On-Site Generation customer back in June of 2021. My reasoning for wanting to be a homeowner solar generation participant was to do my part in helping improve our environment, to be better equipped to conserve electrical energy, and to hopefully stabilize the cost of that electrical energy. Implementation of the Voder Study as it now stands, would be like changing the rules of a football game at half time; the teams, the referees, and the spectators would be thrown into chaos. The only hope for protecting my interests as a Residential Service, On-Site Generation customer of Idaho Power, is that you, Idaho Public Utilities Commission will mediate in modifying the ultimate implementation of any changes to Schedule 6 now and in the future. I know that every successful business must adjust their business plan and rate structures to deal with a changing economy but it must be done with care and reasonable consideration of the effects it has on the current and future customer base. Once the new changes go into effect, whatever they may be, all new applicants for Residential Service, On-Site Generation will know the rules of the game and can fairly assess any benefits of becoming an On-Site Generation customer of Idaho Power. For those of us that became On-Site Generators between December 21, 2019 (the grandfathered cutoff date) and whenever the new rules are implemented, we have no recourse but ask IPUC to intervene on our behalf to secure a fair and equitable implementation of a modified Voder Study. Thank you for your time and consideration of my concerns."

Name: Matthew Duncan
Submission Time: Nov 4 2022 4:28PM
Email: mattdduncan@yahoo.com
Telephone: 208-353-5121
Address: 1714 S. Helen St.
Boise, ID 83705

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "Solar providers should be paid the going rate for power when it is generated and added to the grid. Solar is under compensated due to daytime power is expensive and night time power is cheap or often even free to power companies due to the lack of demand. "

From: [Mary Anne Saunders \(saundersstar@aol.com\) Sent You a Personal Message](#)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 3:32:25 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,

As I have commented before, decisions made on flawed data are simply egregious. When 2 studies show such a wide variance, something is certainly flawed. I implore you to be fair to Idaho consumers and not decide based on a study done only by the industry.

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,

Mary Anne Saunders
2230 Schreiner Ln
Star, ID 83669
saundersstar@aol.com
(208) 870-4532

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: [Vanessa Rosenbaum \(rosenbaum.vanessa@gmail.com\) Sent You a Personal Message](mailto:rosenbaum.vanessa@gmail.com)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 3:38:50 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 am a NICU nurse and Idaho native who is extremely disappointed in Idaho Power. Solar is good for environmental and human health. Please listen to the community you claim to serve, especially the youth whose futures are your responsibility. We want energy democracy and locally-owned solar. It is hypocritical to claim that you care about the environment while supporting a bogus study. It is in your power to do the right thing for the earth and our community.

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,

Vanessa Rosenbaum
401 W Pueblo Street
Boise, ID 83702
rosenbaum.vanessa@gmail.com
(707) 934-5750

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: [Katherine Kanevski \(katkanevski@gmail.com\)](mailto:katkanevski@gmail.com) Sent You a Personal Message
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 3:39:29 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,

Solar power could make a huge different in people lives when it comes to detaching from limited resource energys.

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,

Katherine Kanevski
4260 E Caper Ct
Boise, ID 83716
katkanevski@gmail.com
(208) 841-2210

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 Sanders \(mikejr4@gmail.com\) Sent You a Personal Message](#)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 3:41:06 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 benefits from extra power produced by residential solar to its electrical grids. I'm not pumping power into it when they get to charge more for the power they pay me for. That is ridiculous. The reason why people get solar is to help our environment, and we would also like be compensated for our investment in it. This will only make people invest in house batteries even more so we can cut off Idaho power out of the equation almost entirely. Which I will do if this passes. Capitalism is a greedy monster that will never be full.

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 Sanders
1206 N Cumberland Dr.
Boise, ID 83704
mikejr4@gmail.com
(208) 870-7790

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: [Jeanne Bustamante \(jmbust@gmail.com\)](mailto:jmbust@gmail.com) Sent You a Personal Message
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 3:44:56 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 need to move to renewable energy if we want to keep Idaho liveable. I love Idaho and its beautiful land, and the more we can rely on solar power, the less we will need to rely on energy generation that is bad for 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,

Jeanne Bustamante
250 W Mallard Dr
Boise, ID 83706
jmbust@gmail.com
(208) 965-1644

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: [lori a graber \(lulunmoon@gmail.com\) Sent You a Personal Message](mailto:lulunmoon@gmail.com)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 3:48:59 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 am an Idaho power customer and a rooftop solar homeowner.. I am upset that Idaho power is trying it's trying to use its strong arm to stop solar In Idaho! This is good for everyone and we are challenged by more and more people living here. We need our solar on the grid and we need to be compensated fairly for the energy that we provide to Idaho power.

We also recognized that the study they did was flawed and they did not even listen to the commission's request. This is unacceptable is unacceptable and needs and needs to stop. Solar energy is here to stay and we need healthy competition for petition for our citizens.. I also feel that it helps people Be a part of something that is helping their neighbors.

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,

lori a graber
1379 E Hogan St
Eagle, ID 83616
lulunmoon@gmail.com
(208) 389-8888

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: [Lynda Clark \(CLARKL2780@GMAIL.COM\) Sent You a Personal Message](mailto:CLARKL2780@GMAIL.COM)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 3:49:17 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 support rooftop solar energy.

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,

Lynda Clark
2780 So. Gatewood Ln.
Boise, ID 83709
CLARKL2780@GMAIL.COM
(208) 249-7920

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: [Lori Leatherbury \(loriidaho@gmail.com\) Sent You a Personal Message](mailto:loriidaho@gmail.com)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 3:52:42 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 an owner of solar panels on my home, I'm very disappointed and frustrated with Idaho Power's attempt at lowering compensation rates for solar. Using an incomplete study to justify changes to homeowners solar benefits is unfair and wrong. I will be paying off my solar for Twenty Years and I deserve to have a fair rate of exchange for my investment in my energy and in 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.

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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,

Lori Leatherbury
10120 W. La Hontan Drive
Boise, ID 83709
loriidaho@gmail.com
(208) 866-3256

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: [Jason Jenkins \(jay@idahomesolar.com\)](mailto:jay@idahomesolar.com) Sent You a Personal Message
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 3:53:09 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 am work in the solar industry. Idaho Power trying to capitalize off of the individual home owners that choose to go solar is pure greed. Home owners are choosing to help provide power to the grid at their own expense. Fair is at the current model at 1 to 1 ratio and also to have a true independent study. as stated in the public meeting numerous times this is purly a case of the fox guarding the hen house.

Please reject their own internal study and have a non bias study completed.

We are all in this together and the rapid growth of this area is going to demand other avenues of generating more power or we will be dependent on purchasing power, at a much high rate, thus causing rapid cost increases to the consumer.

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,

Jason Jenkins
11120 W Bodley Dr.
Boise, ID 83709
jay@idahomesolar.com
(208) 861-5662

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: [Gene McGill \(GENEEMCGILL@GMAIL.COM\) Sent You a Personal Message](mailto:GeneMcGill@GMAIL.COM)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 4:00:58 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,

I would like to add my voice to the advocacy of the Sierra Club and other nonpartisan groups and encourage Idaho Power to provide more generous valuation to rooftop solar energy systems. Please consider the benefits of rooftop solar energy systems to avoid carbon emissions. Idaho Power still has significant investment in coal fires plants. Providing incentives for rooftop solar energy systems will help Idaho Power offset coal electric generation and support the intended shuttering of the coal plants.

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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Sincerely,

Gene McGill
2430 W Cherry Lane
Boise, ID 83705
GENEEMCGILL@GMAIL.COM
(619) 248-2373

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 Grainger \(dcgdc10@msn.com\) Sent You a Personal Message](#)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 4:07:13 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 put Solar on our rooftop for a number of reasons. Selling excess power back to Idaho power should remain at the rate I am charged. My capital X expenditure has HELPED the grid when it needs it most.

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.?"

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Sincerely,

David Grainger
1734 W Sugar Crest st
Eagle , ID 83616
dcgdc10@msn.com
(208) 850-6500

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: [Samantha Mooney \(samanthamooney@gmail.com\)](mailto:samanthamooney@gmail.com) Sent You a Personal Message
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 4:14:32 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.

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Sincerely,

Samantha Mooney
1379 E Hogan St
Eagle, ID 83616
samanthamooney@gmail.com
(208) 515-1544

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: [Bryan DuFosse \(bakpabiker@gmail.com\) Sent You a Personal Message](#)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 4:15:03 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 want to install solar on my home but the capital cost is relatively high. Solar is an excellent way to reduce our public electric grid's reliance on coal and natural gas fired power and we should be doing everything we can to incentivize rooftop solar installations.

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,

Bryan DuFosse
5303 W. Grover st
Boise, ID 83705
bakpabiker@gmail.com
(208) 794-3260

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: [Charissa Bujak \(charissabujak@gmail.com\) Sent You a Personal Message](#)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 7:08:08 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.

Dear Idaho Public Utilities Commission,

Investing in solar power now is even more important now than ever. We are homeowners in Boise and we would pay more for solar power options. Thanks for your time.

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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Sincerely,

Charissa Bujak
3713 W Forsythia Dr
Boise , ID 83703
charissabujak@gmail.com
(406) 451-4989

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: [Sayed Bahuddin Mirbacha \(sayedbahauddinmirbacha@gmail.com\) Sent You a Personal Message](#)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 7:34:27 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,

Climate change is a very big thing for me because it has a lot of effect in our life and in our planet. So, as a youth climate activist I'm fighting with climate change and everything that increase climate change in Earth. I really encourage everyone to stand with us and save their life and their planet. It's really matter for me because we are not the last generation in this world we have next and next generation that will affect in their life. I vote to solar power which gives us 100% clean energy and I encourage you all to go by solar and save the Earth.

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,

Sayed Bahuddin Mirbacha
240 E Elwood Ln
Boise, ID 83706
sayedbahauddinmirbacha@gmail.com
(208) 872-0816

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: [Lisa Hecht \(heartfeltson@msn.com\)](mailto:heartfeltson@msn.com) Sent You a Personal Message
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 7:44:26 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 compare the Crossborder and Idaho Power studies to understand the differences and come to a fairer, more balanced conclusion regarding compensation for DE (solar) customers.

Also, the fact that Idaho Power sells RECs at above standard electric prices is market evidence of the value of clean energy. Those of us who generate some of that clean energy Idaho sells should be compensated at some part of that rate, which should be included and reflected in the VODER study.

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,

Lisa Hecht
4920 E. Sagewood Drive
Boise, ID 83716
heartfeltson@msn.com
(208) 841-0058

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: [Susan Patla \(susan_patla@hotmail.com\)](mailto:susan_patla@hotmail.com) Sent You a Personal Message
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 8:00:45 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 an Idaho resident, I want Idaho to encourage wide spread use of solar power to combat Climate warming. Idaho Powers recent study needs careful review.

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,

Susan Patla
2840 Grandview Dr
Tetonia , ID 83452
susan_patla@hotmail.com
(307) 413-1222

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: [Brittany Hawkins \(brittanyahlm@yahoo.com\) Sent You a Personal Message](#)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 8:10:10 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 we should implement all resources and solar would be the next step!

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,

Brittany Hawkins
2556 whispering pine dr #602
Twin falls , ID 83301
brittanyahlm@yahoo.com
(208) 731-5431

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: [Jean Weingartner](#)
To: [Jan Noriyuki](#)
Subject: Solar
Date: Friday, November 4, 2022 8:29:15 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.

I'm a grandfathered in solar owner. I bought solar because we ALL need to do our part to mitigate the damage of climate change.

The population of Boise is growing and businesses are moving here who will use enormous amounts of energy.

You should be encouraging people to add to the grid instead of making it less financially attractive. I understand you are beholden to stock holders, but the bottom line is not merely about money. It's about our health and our future.

I understand only two people will decide this matter. I understand you were appointed by the governor who received \$10,000 from Idaho Power. Hopefully, he wasn't "bought" and neither are you. Our young people are watching what we do. Please do the right thing and support local jobs, show our youth that you care about THEIR future and assure Boise's ability to provide all the electricity needed without building yet another expensive transmission line.

Respectfully,
Jean Weingartner.
Sent from my iPhone

From: [Louis Evans](#)
To: [Jan Noriyuki](#)
Subject: Hearing 11/3/2022
Date: Friday, November 4, 2022 9:01:50 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.

Hello Secretary,

I'm here to advocate for our current net metering system to stay at a 1:1 ratio. That means one kilowatt hour sent to the grid should always get no less than one credit afforded to the owner of a solar system. Solar Companies have been working with Idaho Power for years, helping alleviate the strain on the grid by their solar customers sending their excess generated energy to the grid powering their neighbors homes. This has helped to stop the rolling brown outs and black outs throughout the State of Idaho. Pecking away at that ratio devalues the homeowner's (solar panel owner's) incentive to own their power. Idaho Power knows this. There are well over 600,000 Idaho Power customers throughout the state. All of them already have been contributing to Idaho Power's renewable energy ventures through the "Energy Efficiency Services" fee on their bill every month. The unfortunate part about that is Idaho Power customers only receive a tiny fraction of that generated power they help fund, and the vast majority of that power goes to states like California for which Idaho Power has a contract with. There is no way to justify this proposal where the solar panel owners and solar companies are incentivized. This is greed disguised as logic. Please consider dismissing this proposal. Doing so will keep current solar customers satisfied, future solar customers incentivized, and hard-working solar companies thriving. Thank you.

Kind Regards,

Lou Evans
208-994-5110
www.idahomesolar.com

From: [Jody Mahnken \(mahnkenj@juno.com\) Sent You a Personal Message](#)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 10:08:54 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,

Due to Idaho Power unfair solar rates I haven't purchased solar. Their rates make it completely unaffordable for me. I want clean energy!

Idaho Power's solar study is wrong, reject it and protect fair solar rates.

Thank you.

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,

Jody Mahnken
4140 Oxbow Way
Boise, ID 83713
mahnkenj@juno.com
(208) 672-9284

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: [Melody Asher \(mashermcbride@gmail.com\)](mailto:mashermcbride@gmail.com) Sent You a Personal Message
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 10:25:29 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 believe local solar is important and a energy efficient way to make power for ourselves and our neighbors. It is worth more than what Idaho Power is wanting to pay. I feel that they should pay a fair price for this power.

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,

Melody Asher
2502 Laurie Lane
Twin Falls, ID 83301
mashermcbride@gmail.com
(208) 595-1035

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: [Sam Eurich \(sameurich@gmail.com\)](mailto:sameurich@gmail.com) Sent You a Personal Message
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Friday, November 4, 2022 10:38:25 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,

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,

Sam Eurich
671 Con Virginia Drive
Hailey, ID 83333
sameurich@gmail.com
(208) 559-7682

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.



Idaho Public Utilities Commission
11331 W. Chinden Blvd.
Boise, ID 83714

November 4, 2022

Re: Case # IPC-E-22-22, Idaho Power solar study

Dear Commissioners,

I'm writing on behalf of over 5,000 Idaho Power customers who are Sierra Club supporters to advocate for *fair rates* for locally-owned rooftop solar systems in Idaho, which must start with a *fair study* to calculate those rates. Idaho Power's study is flawed and biased, and must be rejected by the PUC.

Idaho Power's study is biased, needs independent review.

- Idaho Power, like electric utilities across the nation, has been actively trying to suppress customer-owned rooftop solar installations for over a decade, since customer-owned energy doesn't yield as much profit as utility-owned energy and requires the utility to manage its grid in some different ways.
- Idaho Power tried to reduce solar export credit rates from the current 8-10 ¢/kWh to nearly 2 ¢/kWh in 2019, which would discourage customer solar ownership. It's now using this new study to justify that proposed decrease.
- However, the same study conducted by an independent third party [found](#) that the value of rooftop solar power was actually closer to \$18.3 ¢/kWh, nearly *five times* what Idaho Power proposed.
- Idaho Power's study is not "fair & credible" as required by the PUC—it's clearly skewed toward its own corporate interests and **should be replaced or heavily supplemented with external independent analyses.**

Idaho Power's study is incomplete, needs environmental benefits.

- Idaho Power neglected to include any environmental benefits in its calculations, claiming that they are irrelevant, non-quantifiable, and don't affect rates.
- More solar energy helps reduce carbon emissions, which helps curb climate change and the range of costs associated with it, including on utility rates.
- Idaho Power itself acknowledges the impacts of climate change on its system in its 20-year [Integrated Resource Plan](#), has its own [100% clean energy commitment](#) to help mitigate climate change, and even [told the public that it would include climate and environmental factors](#) in its solar value study during the design phase last fall.
- Yet, the company conveniently decided to exclude environmental benefits from its final study, in an effort to clearly keep the export credit rate as low as possible.
- These benefits are real, quantifiable, impact rates, and **should be included in the study.**

Idaho Power's study is inaccurate, needs updated data and methods.

- Idaho Power used outdated data, some from studies conducted ten years ago, which don't reflect the current reality of energy prices or even its own system plans.

- It also failed to take into account the sustained increase in energy prices due to the War in Ukraine, and the financial risk of increasingly volatile fossil gas prices.
- Idaho Power sometimes used overly complicated calculation methods when analogous, more transparent methods that meet industry standards exist.
- Solar owners deserve full and accurate compensation for the valuable local, clean energy they put back onto the grid that supplies power to their neighbors.
- Each data source and methodology **should be scrutinized and brought fully up-to-date.**

Idaho Power's study is impactful yet inaccessible, needs public input.

- Idaho Power plans to use the results of this study to justify proposing the replacement of its Net Metering program with a much lower Export Credit Rate system.
- This will make customer-owned solar less affordable and create undue financial barriers for Idaho Power customers who wish to exercise their right to install a solar array to help meet their energy needs—including homes, businesses, farms, schools, and even municipalities, particularly in low-income communities.
- All customers will be deeply impacted by the results of this study and subsequent rate changes, particularly customers who have installed solar arrays since December 2019 and customers who wish to install solar in the future, including our youth.
- Idaho Power's study is not easily accessible to the average customer, and its public education and engagement with key stakeholders have not been adequate.
- Back in 2019, the PUC decided to reject Idaho Power's proposal to reduce solar compensation rates due to public outcry, lack of sufficient evidence, and inadequate stakeholder engagement, which are all surfacing in this case, as well.
- The PUC **should once again prioritize customer impacts, concerns, and accessibility in its decision on whether to approve Idaho Power's study.**

Please reject Idaho Power's study and require a more impartial, complete, accurate, and accessible analysis consistent with the concerns from the 800+ customers who have commented and testified on this case.

Our members want to see more solar panels in their communities to help address the climate crisis, improve public health, advance our clean energy economy, create green jobs, build local grid resilience, and stabilize energy bills. Please don't let Idaho Power quash locally-owned solar and push these critical opportunities out of reach for Idaho communities at a time when we need them the most.

Sincerely,



Lisa Young
Director

From: [Katherine Zuckerman \(antigone2@gmail.com\) Sent You a Personal Message](#)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Saturday, November 5, 2022 12:00:00 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 do everything you can do to preserve beautiful Idaho.

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,

Katherine Zuckerman
3022 N Tamarack Dr
Boise, ID 83703
antigone2@gmail.com
(208) 713-1222

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: [Malorie Nilson \(malobee@icloud.com\) Sent You a Personal Message](#)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Saturday, November 5, 2022 2:24:00 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,

In a world that is ever more threatened by climate change, we need more options to lessen our dependency on fossil fuels. Transparency in partnerships with power companies regarding solar options is a key part of this process. Idaho power has repeatedly cited outdated data that was shown to be misleading by an independent third party study.. I think that Idaho power should be held accountable for this incomplete study and that compensation rates should be fair representations of value.

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,

Malorie Nilson
450 W. Reese St.
Boise, ID 83706
malobee@icloud.com
(208) 284-5279

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: [Janine Lambert \(jnnlambert9@gmail.com\) Sent You a Personal Message](#)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Saturday, November 5, 2022 5:59:47 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.

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Sincerely,

Janine Lambert
152 E 18th St
Idaho Falls, ID 83404
jnnlambert9@gmail.com
(248) 463-0927

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: [Janet Yokan \(jbyokan@yahoo.com\)](mailto:jbyokan@yahoo.com) Sent You a Personal Message
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Saturday, November 5, 2022 6:52:54 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,

Solar power is part of the future. Idaho power should be grateful that so many want to embrace it with longterm vision in mind. Anything short of Idaho power supporting solar is very short sighted. As water power diminishes and the full cost of coal burning becomes acknowledged we as consumers should have the freedom to choose. Idaho power should encourage not inhibit this consumer choice for our long term needs. The reverse metering rates should be fair market value.

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,

Janet Yokan
Po Box 9496
Boise, ID 83707
jbyokan@yahoo.com
(605) 321-9482

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: [Maggie Trautman \(Ifuonlyknw8@yahoo.com\) Sent You a Personal Message](#)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Saturday, November 5, 2022 7:40:15 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 started solar for the environmental benefits. It's not a means to get rich, but we should be fairly compensated and matched with numbers based on independent studies. Numbers coming from the company that have an interest in undervaluing the results are problematic.

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,

Maggie Trautman
5008 West Spaulding Street
Boise, ID 83705
Ifuonlyknw8@yahoo.com
(208) 570-1689

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: Saturday, November 5, 2022 8:00:08 AM

The following comment was submitted via PUCWeb:

Name: Charles James
Submission Time: Nov 5 2022 7:58AM
Email: cjprizes@msn.com
Telephone: 208-861-5469
Address: 9300 West Coleen Drive
Boise, ID 83709

Name of Utility Company: Idaho Power Company

Case ID: IPC-E-22-22

Comment: "First of all, isn't the fact of Idaho Power doing their own study a classic conflict of interest? I believe that the PUC should request that Idaho Power pay for three independent studies, these three independent studies should be hired by the PUC and not Idaho power. Once the studies were completed, they should be compared to the Idaho Power study. The three studies should be broken down and come up with an average indicator of what should be done moving forward regarding the compensation of independent power generators. "

From: [Michal Lloyd \(michallloyd@icloud.com\) Sent You a Personal Message](mailto:michallloyd@icloud.com)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Saturday, November 5, 2022 8:41:24 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 consider what is best for Idaho and the citizens of Idaho, not just Idaho Power.

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,

Michal Lloyd
1007 W. Resseguie St.
Boise, ID 83702
michallloyd@icloud.com
(208) 391-0649

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: [juliana.puzio \(juliana.puzio@gmail.com\) Sent You a Personal Message](mailto:juliana.puzio@sierraclub.org)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Saturday, November 5, 2022 9:22:06 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.

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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,

juliana.puzio
11019 W Southerland St
Boise, ID 83709
julianapuzio@gmail.com
(208) 861-5182

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: [Ted Stout \(ted.stout1@gmail.com\)](mailto:ted.stout1@gmail.com) Sent You a Personal Message
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Saturday, November 5, 2022 9:43:23 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 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,

Ted Stout
310 S. 1st Street
Bellevue, ID 83313
ted.stout1@gmail.com
(208) 721-7402

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: [Barbara Aronowitz \(aronobarb@gmail.com\) Sent You a Personal Message](#)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Saturday, November 5, 2022 9:44:09 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,

We need to move forward, not backward in terms of energy. Idaho Power's report undervalued the benefits of solar power.

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,

Barbara Aronowitz
118 Trail Creek Drive
Victor, ID 83455
aronobarb@gmail.com
(516) 512-4539

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: [Rick Rudd \(rkrudd@live.com\)](mailto:rkrudd@live.com) Sent You a Personal Message
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Saturday, November 5, 2022 10:18:16 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 recently had solar installed, from the materials I've studied I feel Idaho Power is significantly undervaluing the value of residential solar. I am not in favor of them being allowed to move forward with this,

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,

Rick Rudd
1455 W 12th St4147
Emmett, ID 83617
rkrudd@live.com
(208) 830-0388

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: Saturday, November 5, 2022 1:00:11 PM

The following comment was submitted via PUCWeb:

Name: Duane Hamilton
Submission Time: Nov 5 2022 12:14PM
Email: hamduane@msn.com
Telephone: 208-484-2500
Address: 3432 Summerset Way
Boise, ID 83709

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "I am amazed that Idaho power wants to change net metering for Solar customers as this prevents an overload to their grid which is highly stressed after all the new Idaho Power customers have moved here. I not only think they should keep net metering for customers who have paid a lot to help them overcome this stress but to actually offer more incentives for more customers to do the same. I am strongly opposed to decreasing my net metering!"

From: [April Pletcher \(apbeamer@yahoo.com\) Sent You a Personal Message](#)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Sunday, November 6, 2022 6:55:38 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,

Our home gets a lot of sun! If affordable, would be the BEST!!

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,

April Pletcher
148 Antelope Drive
Salmon, ID 83467
apbeamer@yahoo.com
(208) 303-0271

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: Sunday, November 6, 2022 1:00:13 PM

The following comment was submitted via PUCWeb:

Name: Charles Sierra
Submission Time: Nov 6 2022 12:49PM
Email: ancile05@yahoo.com
Telephone: 208-631-5701
Address: 2922 S. Andros Way
Meridian, ID 83642

Name of Utility Company: idaho power

Case ID: IPC-E-22-22

Comment: "Idaho Power concluded that the value of solar is between 2.7 and 4.0 cents per kWh. The current electricity rate is between 8 and 10 cents per kWh. If Idaho Power's suggested value of solar is ultimately accepted by the PUC, solar owners would be compensated at a much lower value than what they pay for electricity – making solar less attractive of an investment and spelling trouble for our climate and communities. This is an obvious attempt by Idaho Power to double dip on their profits. and stick it to the people of Idaho."

From: [PUCWeb Notification](#)
To: [Jan Noriyuki](#)
Subject: Notice: A comment was submitted to PUCWeb
Date: Sunday, November 6, 2022 2:00:15 PM

The following comment was submitted via PUCWeb:

Name: Charles Sierra
Submission Time: Nov 6 2022 1:28PM
Email: ancile05@yahoo.com
Telephone: 208-631-5701
Address: 2922 S. Andros Way
Meridian, ID 83642

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "Greetings, On June 30, Idaho Power released its Value of Distributed Energy Resources (VODER) study which provides the utility's analysis of the value of solar as well as a few other issues. This study will be used by the utility and the Public Utilities Commission (PUC) to determine the amount and the way that solar owners are paid for their solar production. Idaho Power concluded that the value of solar is between 2.7 and 4.0 cents per kWh. The current electricity rate is between 8 and 10 cents per kWh. If Idaho Power's suggested value of solar is ultimately accepted by the PUC, solar owners would be compensated at a much lower value than what they pay for electricity – making solar less attractive of an investment and spelling trouble for our climate and communities. I find this to be very concerning, we made a significant investment and purchased our solar system with the belief that we would be getting a 1 for 1 exchange with Idaho power. We were told that we would be able to bank our excess power production for use in the winter months when our system generated less power. This is the only way it made sense for us. Now with Idaho power wanting to double dip on their profits at our expense, we will be operating a loss. We will have to pay on our loan to the solar company and to Idaho power. How do they get to dictate how much they will pay us for our power supply? We paid for our own infrastructure to make this power not Idaho Power. Sincerely, Charles w Sierra."

From: [PUCWeb Notification](#)
To: [Jan Noriyuki](#)
Subject: Notice: A comment was submitted to PUCWeb
Date: Monday, November 7, 2022 7:00:07 AM

The following comment was submitted via PUCWeb:

Name: Perry Brown
Submission Time: Nov 6 2022 6:16PM
Email: perry.s.brown@gmail.com
Telephone: 208-859-1706
Address: 2809 N Hillway Dr
Boise, ID 83702

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "I am writing you this evening asking for your help to protect fair and reasonable net metering and ensuring that Idaho Power provide fair compensation residential solar power generators. I have lived in Boise for 24 years. I am a physician. And I am a conservationist. I installed solar panels on my roof for both financial investment and for conservation and our need to reduce our carbon footprint on our planet, related to climate change. When I did so, it made reasonable financial sense while doing the right thing for our planet. What Idaho Power is now proposing will completely change the rules and the power / money sharing arrangement after I have made my significant investment (\$55,000), and result in this having been a very poor decision for me, and perhaps more importantly, for others who might still consider solar power production for their home. Their new net metering structure is going to significantly decrease interest in household solar power production, and result in net increased use of other, higher impact energy production. This goes against the best interest of our citizens, our community, and our planet. The research upon which they are basing their proposed change is flawed, and uses outdated data. They are trying to use "fuzzy math" to make their case, which at the surface clearly is unfair and immoral. I urge you to not allow Idaho Power to change their net metering program. Why should I pay more for their kWh than they pay (or credit me) for mine? If there is increased cost that we consumers need to pay for infrastructure, then increase the \$5.24 per month charge to \$10 or \$15. But please don't allow the net metering program to change. And if you do allow the net metering program to change, which I would very much be opposed to, I at least ask you to only allow them to do this for solar production installed after a given date, to protect those of us that have already installed our system or have a contract to install a new system in coming weeks from a complete change in the ground rules. We deserve some protection. I appreciate your consideration on this. This is a big deal. Thank you. Dr Perry Brown"

From: [Adam Rush](#)
To: [Jan Noriyuki](#)
Subject: FW: IPC-E-22-22
Date: Monday, November 7, 2022 9:42:55 AM
Attachments: [PUC \(1\).docx](#)

From: Bryan Lawley <bryan@egtsolar.com>
Sent: Friday, November 4, 2022 4:25 PM
To: Adam Rush <adam.rush@puc.idaho.gov>
Subject: IPC-E-22-22

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.

Adam,

My file was too large to submit through the PUC website and I wanted to make sure the IPUC received this prior to the 5pm deadline this evening for public comment. I trust you can push this to the commissioners on my behalf? I was able to testify last evening but I felt it critical to expand on many of mine and other's points made. Thank you in advance for getting this submitted for me.

Best,



 **Bryan Lawley** / President
208.602.9583

EGT Solar
208.795.5170
401 N Main Street
Meridian, ID 83642

In reference to IPC-E-22-22: I first want to thank the IPUC for simply doing the right thing and allowing the 3 public hearings throughout Idaho regarding this issue. I did not feel I got the opportunity to truly voice my testimony in the very short amount of time allotted and thus the reason for these expanded comments. As I mentioned in my testimony last evening here in Boise, I have gone through every attempt from ID Power over the last 12 years to slash solar net metering equality and thus I feel my input in this matter carries much more weight and should provide more perspective prior to your decision in this matter. Several points were made last evening by myself and other courageous individuals that I wanted to highlight and expand on:

1) This decision certainly will affect/destroy the Idaho solar economy not just in the short term but for many generations to come.

The gentleman that referenced jokingly the age of Mr. Anderson did bring something to the surface that I think is very important to consider. The decision made by this commission at the ages they represent can not forget that the people most effected by siding with ID Power's proposals are our children and grandchildren and what a shame to not allow them to exercise their right to choose their power. Siding with ID Power would be simply going backwards in a time where solar will dominate every state's future power needs. The other major issue with this is regionally a bad decision here would set a very ugly precedent for other states/utilities to use this rate case for their benefit. Do you really want to make the IPUC and Idaho such an example?

2) I mentioned last evening the back door conversations and illegal actions by Idaho Power employees to talk high profile local businesses from going solar but was not able to have any time to disclose these happenings.

I want to bring 2 of many of these instances to light so the IPUC understands the continual fight we have been forced to fight for years in our local industry. I will reference contacts in this email that are willing to validate these events.

Blue Cross of Idaho: I started working with BCI in mid-2019 under a directive of the CEO to investigate how solar could benefit their primary location in Meridian. Prior to the initial meeting knowing that ID Power would do everything in their power to not allow such a high-profile client to not only go solar but push a huge marketing campaign once it was operational, I quickly researched my upcoming audience. I quickly learned that the former CEO of Idaho Power Daryl Anderson was on the board at BCI. Having several friends that are high up within BCI I reached out to them and asked if they felt this was going to inhibit the board's decision on this matter. They assured me that it would not be an issue and thus we proceeded with our initial meetings with the executive team. Upon designing and creating an accurate estimate I instructed my internal team to be as conservative as possible with our assumptions and all our production calculations knowing ID Power would also be reviewing this as what they claim to be "a courtesy service to their larger clients". I also asked from the very beginning to be involved in all conversations with ID Power in order to rightfully defend any arguments within our proposal. It was brought to my attention from a BCI employee that ID Power's finance team had scheduled a zoom meeting to discuss their analysis of our estimate which I of course was not invited to attend as they assured me I would from the start. Fearing and knowing the reason for this meeting I was sent the zoom link for this call and intentionally jumped on the call 15 min after it had started to give ID Power a chance to be mid conversation. When my name popped up on the zoom link the conversation ended abruptly to BCI's confusion as ID Power called this meeting and now would not finish the conversation

knowing I was listening in. The CEO for BCI was extremely frustrated as to why they called a meeting and now would not continue which was wasting everyone's time and asked the ID Power team several times what the purpose of this meeting was, why they called it, and why there was no further conversation. BCI has not yet moved forward with this project as the CFO at the time would simply not sign off on approval to move forward as the only member of the executive team that was not in favor of this project. Ironically, I was told also that Daryl Anderson was also one of the only board members also not in favor of proceeding with the project. I have since learned from BCI executives that Daryl no longer occupies his board seat and the CFO is no longer employed by BCI and BCI now wants to once again explore proceeding with this project. The quotes below are taken directly from email correspondence from an internal BCI employee. The IPUC has to understand that this type of illegal influence has occurred since the existence of my company and thus has cost my company millions of dollars of revenue which has essentially cheated the state out of tax revenue, cheated our local economy from this money not being recirculated, and of course cheated these clients in the social and financial benefits these projects truly provide.

"Finance deterred the momentum along with Idaho Power"

"They have done an analysis for us so I am very interested to see what they came up with because they were scrambling the last time we all met"

Another instance that has to be pointed out stems back to 2018/2019 when this matter was put before the IPUC for the agricultural and industrial clients. At that time, we were nearing the closing of a \$8.9M agriculture solar project for Grant and Hagan Farms located in Eden ID. This project would have taken their operation nearly to 100% offset for the foreseeable future. As Rob Black my VP and I were driving to Twin Falls to close this deal with Mr. Grant and Mr. Hagan they called us when we were 30 min away to divulge a conversation, they had just had with Randy Mendiola their ID Power rep at the time. They quoted Mr. Mendiola with saying "I know you are about to do a large scale solar project for your farms and I am calling to encourage you not to go that route as we at Idaho Power are in active discussions to slash the value of solar net metering and to reduce the demand and KWh rates for agricultural meters so it would not be in their best interest to proceed as it would not reach the payback that we (EGT Solar) was representing." We then met as planned and Mr. Grant and Mr. Hagan agreed to at min submit all 33 meters applications for net metering approval from ID Power. These were submitted and approved giving Grant and Hagan 1 year to have the solar systems installed and operational prior to application expiration. Continued conversations with ID Power with Grant and Hagan led them to be persuaded to hold off of this project and thus the applications expired which would have given them grandfather status until 2045 on this installation. Fast forward a few months the IPUC allowed net metering compensation to be devalued during the C&I rate case. We have stayed in contact with Mr. Grant and Mr. Hagan and they are very bitter with how this transpired and regretful that they did not heed to our advice to proceed with the project as rates and demand fee's were not in fact lowered as ID Power stated and by not doing this project this cost their operation a substantial amount of millions of dollars in avoided electricity and demand charges for one of Idaho's largest potato growers. Mr. Grant is aware of ID Power's continued attempts to devalue solar now in the residential sector and has agreed to be available to validate this occurrence should you want to discuss this matter further. Mr. Grant on a phone call this morning quoted "I remember very well what I was falsely promised and what actually transpired".

This type of back door behavior is commonplace and highlights ID Power's monopolistic approach to control all things power in this state despite the public messaging that they fully support renewable energy growth. What are small business' like mine legally advised to do against a giant like ID Power?....don't even bother as they have too deep of pockets and would string legal action out until you were out of business or bankrupt. This is why you as the IPUC must stand up for the private sector and for Idaho's right to have a choice of how they procure their power.

3) In all previous rate cases regarding solar net metering in all meter classes the IPUC has had a very clear and loud message from ID Power on the misrepresentation and misleading sales tactics that occur within the solar industry.

I would be a rich man and not putting up this extreme fight in this matter if I had a dollar for every time, I have heard an ID Power employee reference this subject matter. This in my opinion is their staple stance to attack net metering here in ID. Yes, there are bad apples in the solar industry just like any other industry that train sales representative incorrectly to represent being "in charge of ID Power net metering" or misleading social media adds showing Governor Little behind an add saying that Idaho is paying residents to go solar in ID. All this I agree is terrible for our industry and does mislead consumers but again these types of ads exist in every other industry and consumers have a responsibility to research any company they are considering using to determine the validity of their offering. These "fly by night" companies that primarily employ a door-to-door canvassing approach make up a very small % of the annual installations in this market. There are several truly local operations that have clean reputations and long track records of not misleading consumers but rather selling through education and not high-pressure tactics. This is the message ID Power uses in front of all large industrial solar inquiries to deter them from truly evaluating whether going solar would be a benefit to their operations. In 2019 ID Power worked with the local solar industry to create the Idaho Solar Consumer Protection Act which gives the ID Attorney General the authority to take legal action against companies that are found to be using these misleading tactics. The companies that have chosen to run ethically were all in support of this as a mechanism to ensure a healthy and honest local solar industry. It should not be the IPUC's responsibility with laws like this now in place to have their viewpoints and decisions swayed by these comments.

4) As mentioned last evening the responsibility of the IPUC is to protect the best interests of Idaho ratepayers totaling 675K+ residents not the 2000+ employees from Idaho Power.

This is the IPUC's chance to remove the stigma of continually siding with Idaho Power and what is in their best interests as a stock driven for profit corporation. I ask that you follow your appointment and follow through with the reason you sit in the chairs that you do.

5) There is a stigma also around solar that only the leftwing Idahoan's are the solar adopters.

This could not be further from the truth and in my vast 12 year experience the far majority of solar adopters are rather conservative Idahoan's that see the financial payback value associated with solar.

6) Idaho Power in 2022 has consistently and illegally pushed misinformation out regarding this proposed change in net metering buyback rates.

I can recount 15-20 conversations this year with prospective clients that prior to reaching out to EGT Solar had called ID Power customer service for guidance for finding a qualified solar contractor and were verbatim told by Idaho Power customer service reps that install solar was a huge risk as they had already changed the 1/1 credit structure. This led me to call my contacts within Idaho Power customer service department to inform them on this misinformation and to ensure that message was not continually pushed out as that was absolutely not the case and that was illegal for them to do that. I also emailed the Idaho AG regarding this matter with no response back from them in July of this year. The damage this has done financially by using unfair scare tactics is not acceptable and again ID Power should be held accountable for these under the table tactics. This on top of having solar clients have to initial in 5 separate areas when submitting a net meter application is hard enough to combat as ID Power's disclaimers are in themselves very leading to them making changes to the current structure.

Hourly Netting Request-This is a huge issue as the only party that benefits from this is of course ID Power. A solar customer under the current monthly netting structure has a clear checks and balances against accurate credit accumulation and reporting and against what they were proposed from their solar provider in their initial estimates. Hourly netting strips a consumer checks and balances away from them which simply cannot be allowed to happen. The other major issue here is ID Power pushed into law the Idaho Solar Consumer Protection Act as a way to hold solar providers accountable for misrepresentation and misleading sales tactics and allow for the ID Att General to step in and be able to have a clear legal route for consumers against solar providers. Yes, we have bad apples in the solar industry and yes, they should be held accountable however this is true of any industry but because solar is a direct competitor to Idaho's monopolistic utility this is a constant driver/platform that ID Power has pushed as means to make these detrimental changes to net metering. The more critical issue here is having this consumer protection act in place we are required to have many disclosure statements in order to even provide a solar estimate to any consumer. If hourly netting is allowed it leaves solar providers wide open to lawsuits as providing an accurate estimate of a solar system payback becomes virtually impossible as every ID Power rate payer uses power differently every hour seasonally here in ID. Stripping back the layers this request by ID Power is a clear attempt to make solar providers jobs nearly impossible and have to staff engineers to work through a customer's 8760 hourly power intervals from the previous 12 months which is a hugely expensive and time consuming exercise and sure to be wrong with so many other weather factors year to year here in ID. I urge the IPUC to heavily question the true motives behind this request and maintain the current monthly netting structure that has worked very well for many years.

Lack of Environmental Valuation-This study for many reasons is a clearly bias study for anyone who has any knowledge of the local solar industry. For ID Power to not provide a value for environmental impact that distributed solar does indeed provide is very short sided. Solar provides an immense carbon reduction which yes is hard to truly measure but to just simply skim over this section as they did should leave many questions for the IPUC in this discussion.

From: [PUCWeb Notification](#)
To: [Jan Noriyuki](#)
Subject: Notice: A comment was submitted to PUCWeb
Date: Monday, November 7, 2022 9:00:05 AM

The following comments were submitted via PUCWeb:

Name: Aaron von Lindern
Submission Time: Nov 7 2022 8:54AM
Email: aaronvonlindern@hotmail.com
Telephone: 520-730-4049
Address: 3685 N Maywood Dr
Boise, ID 83704

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: " I was unable to attend the hearing in person, but as an Idaho Power customer I want to let the PUC know that I am concerned that by using outdated data and methodologies that undervalue distributed generation, Idaho Power has not produced a study that fairly values electricity exported by customers with solar generation. I urge the PUC to listen to public input and make sure that electricity generated by residential and business customers with solar is is compensated accurately."

Name: Perry Brown
Submission Time: Nov 7 2022 8:22AM
Email: perry.s.brown@gmail.com
Telephone: 208-859-1706
Address: 2809 N Hillway Dr
Boise, ID 83702

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "Good morning. I submitted a prior comment, but forgot to add one additional important piece. Currently, net metering rules for Idaho Power limit system "size" such that medium to large capacity residential solar generation systems cannot add battery backup without exceeding this maximum size. I believe that that maximum size is 25 kWh, though I'm thinking I don't have the correct unit on that. I was told that we would exceed maximum system size if we wanted to add battery backup. Again, I am firmly opposed to allowing Idaho Power change the ground rules for net metering for reasons already stated, especially for those of us who installed our solar power system and are already generating power under the current system. We should at least be "grandfathered" to stay in the current net metering plan. But, if IPC does approve ANY change to Idaho Power's net metering plan, I ask that the size capacity for residential systems be increased substantially, to allow us to add battery backup to our residential solar power system and at least hold onto our generated kWh rather than lose full

credit for them under a new net metering plan. Idaho Power should not be able to "have its cake and eat it too". They should not get changes that benefit them without some changes that benefit their customers and those of us who have invested significantly (in my case, \$55,000) to generate electricity under the net metering plan that existed at the time that our decision was made to do this. Thank you for your consideration. Dr Perry Brown"



RECEIVED

2022 NOV -7 AM 10: 50

Public Hearing City

Twin Falls

Date

November 2, 2022

IDAHO PUBLIC
UTILITIES COMMISSION

COMMENT FORM

Please use the space below to file a comment in this case. Add extra sheets as needed.

You may either hand this sheet to a commission staff member or mail it to:

IPUC, PO Box 83720, Boise, ID 83720-0074

You may also post comments on our website:

<https://www.puc.idaho.gov/>

Click on the "Case Comment Form" link

I attended the November 2 PUC hearing in Twin Falls. I have substantial hearing loss & was unable to follow the proceedings.

I am a seventy year old farmer. I have a 100kw solar generating station which produced 236,097 kWh in 2021.

I am asking you to remove Idaho Power's 100kw cap per solar generation sight.

I believe on sight solar generation, on sight battery storage and behind meter utility control is the most prudent way forward, e.g. Rocky Mountain Power's agreement with Soleil Lotts in Salt Lake, UT.

Thank you.

The following information is required for your comment to be filed with the case. (Note: When submitting a Comment in a current case, the Comment constitutes a public record under Idaho Code § 9-337(13). All information you provide is available for public and media inspection and may be reviewed by the utility.)

Print Name

Dale Hooley

Sign Name

Dale Hooley

Address

26796 Indian Cove Ln

Phone Number

208-599-0119

City, State, Zip

Hammett, ID 83627

Email

dale hooley 899@gmail.com

Reference: Guest Commentary – Idaho Power supports rooftop solar-and fair prices for all (by Teresa Drake-senior manager of customer relations and energy efficiency at Idaho Power)
(Idaho Press – Sunday, October 30, 2022)

Response the above article follows:

The article mentioned above asks “Would you pay \$10 – or even \$5 – for something that may only be worth \$2? Most of us would say no. We are willing to pay our share, but we expect prices to be fair.”

“This is the question at the heart of an Idaho Power case before the Idaho Public Utilities Commission (IPUC) involving customers who generate their own power – usually with solar panels.”

This commentary as submitted expresses that due to the current policy on net metering you are over compensating solar customers who send energy back to the grid, “which leads to a higher costs for all customers.” This article states that Idaho Power pays residential solar producers “around 10 cents per kWh.” Why would we do this when “we will soon begin buying the output from Twin Falls called Jackpot Solar. We’ll start off by paying less than 2.2 cents per kilowatt-hour (kWh) for this energy.”

The above statement is grossly incorrect or deceiving at best. I am a residential solar energy producer and I like other solar energy producers receive no payment for the extra energy we put back into the power grid. We receive a “credit” toward future use. That is free kWh’s to Idaho Power. Power from systems we paid for and maintain.

Please do not insult the reading public by stating: “we’re working to update our policies so the 2% of our customers who have solar panels aren’t being subsidized by the 98% who don’t.” In reality there is no overcompensating customers who send solar energy back to the grid free.

Do not justify your attempt to change your pricing policy on net metering due to overcompensating solar producers when the present policy gives you energy at no cost. No cost in power, no cost in maintenance and no cost in startup.

Stephen Rubadue
Idaho resident.

1558 W Edwards Loop
NAMPA ID 83686
208-461-1134

RECEIVED
2022 NOV -7 AM 10:49
IDAHO PUBLIC
UTILITIES COMMISSION

From: [PUCWeb Notification](#)
To: [Jan Noriyuki](#)
Subject: Notice: A comment was submitted to PUCWeb
Date: Friday, November 4, 2022 4:00:08 PM

The following comments were submitted via PUCWeb:

Name: Tyler Lobdell
Submission Time: Nov 4 2022 3:40PM
Email: tlob456@gmail.com
Telephone: 208-859-3887
Address: 3449 S Norfolk Way
Boise, ID 83706

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "Dear Idaho Public Utilities Commission, I am a homeowner living in Boise with my wife and two young sons. We installed rooftop solar on our home in September of 2021. I am an Idaho Power customer. I respectfully request that the Idaho Public Utilities Commission ("IPUC") reject Idaho Power's study and proposal to dramatically reduce the rates paid to residential, on-site solar electricity generation. First, the Idaho Power study is not objective and was apparently designed to reach a foregone conclusion. Idaho Power's main interest clearly is maintaining its monopoly and maximizing profits. Thankfully, the IPUC has a different mandate and an obligation to protect the public good. In the face of a growing climate emergency, distributed solar electricity generation is one of the best, most economical, and readily deployable solutions available. Penalizing citizens for taking the initiative to be part of the solution and disincentivizing future rooftop solar installations is contrary to the public good for many reasons. In addition to being a carbon neutral source of energy, distributed rooftop solar provides the grid with flexibility and resilience that centralized, IOU owned and operated electricity generation cannot match. Idaho Power boasts about its use of hydroelectric power as part of its sustainable portfolio, but as our southern neighbors are learning through the dramatic decline in Lake Powell water levels, hydropower itself is vulnerable to the effects of climate change. Idaho Power should be embracing tools to encourage resilient, clean electricity generation to bolster our clean energy portfolio, instead of stifling it. Second, Idaho is a place where individual choice and freedom are highly valued and protected. Private citizens investing their own capital to help transition our state into the clean energy system of the future is exactly the kind of citizen-led reform that Idaho should embrace and encourage. Idaho Power's attempt to undervalue this electricity generation to pad its profits is blatant overreach by a government created monopoly. I already pay a \$5 fee every month for the privilege of generating my own electricity and sharing some with my neighbors. Idaho Power cannot be allowed to profiteer off my private investment and willingness to join the citizen-led effort to decarbonize Idaho's power grid. Third, to quote a gentleman that gave oral comments at the November 3rd public hearing: "All I want is fair credit." Rooftop solar owners are not seeking a windfall, we only seek fair treatment in the face of a powerful, self-interested monopoly. Idaho Power's proposed rate reduction would place rooftop solar out of reach for citizens without substantial financial means and a willingness to take a financial loss. Participating in the citizen-led effort to decarbonize Idaho's grid should not be limited to the wealthy and altruistic. As Idaho begins to embrace other, far less effective climate mitigation

measures, such as development of so-called biogas from agricultural wastes, dispersed solar generation should be at the top of the IPUC's list of transition tools to encourage. For these reasons and those expressed by the Sierra Club and Idaho Conservation League, I respectfully ask that you reject Idaho Power's study and chart a path forward that fosters robust development of rooftop solar throughout Idaho. Sincerely, Tyler Lobdell, Esq. 3449 S Norfolk Way Boise, Idaho 83706 "

Name: Debbie Olson
Submission Time: Nov 4 2022 3:10PM
Email: debbieolson123@gmail.com
Telephone: 208-954-3495
Address: 2415 W Madison
Boise, ID 83702

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "Reference Case IPC-E-22-22 Debbie olson 2415 W Madison Ave Boise, ID. 83702 208-954-3495 First, I would like to thank the commission for giving us the opportunity to voice our concerns about the unfairness of Idaho Powers treatment of those of us with Roof Solar panels. *All people with panels should be grandfathered in- no matter when they could afford to add them. * I propose a through investigation be conducted on Idaho Power. It was evident last night that the company has not followed your request for a fair and unbiased survey. I am concerned that Idaho Power is copying the PG&E model and our state will be ruined by their neglect. * I also, would like all Solar Panel companies to have the same policies and regulations. When I had my panels added I was cheated out of several dollars of promised compensation. Their excuse was it wasn't written down. This left me a very unhappy customer with very expensive panels on my roof. Idaho Power sent a representative out to have me sign papers. I remember his comment "we will miss you a amazing costumer". It took over two years for my panels to actually make it so that monthly bill is less than \$10. Why is my bill higher than others? I am finally happy to have them and then Idaho Power wants to change the game plan. Please tell them no. * I agreed with many of the speakers last night that Idaho Power is not taking care of their costumers. The condition of our earth right now is sad and unhealthy. One would want to count on and hope that the energy companies of our country would be promoting and using best safe practices. Idaho Power is not. They treat us like enemies. Again, thank you for your time."

Name: Pete Friedman
Submission Time: Nov 4 2022 3:33PM
Email: pfaicp@yahoo.com
Telephone: 208-869-4969
Address: 4088W. Quail Ridge
Boise, ID 83703

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "Dear Commissioners, We previously commented on the referenced case suggesting that an independent entity conduct the cost analysis. Due to conflicting studies submitted to the commission, we request an independent analysis be conducted prior to any decision on the application. Sincerely Pete and Betsy Friedman"

Name: Anthony Marker
Submission Time: Nov 4 2022 3:26PM
Email: anthonymarker@gmail.com
Telephone: 208-571-9813
Address: 1008 Glen Haven Place
Boise, ID 83705

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "I'm super disappointed that Idaho Power has chosen to reduce incentives for customers to install rooftop solar panels. We had these panels installed in August 2022 knowing ahead of time that we would still have to pay some on our electrical bill (our offset is only about 90%). Still, we believed it was the right thing to do. With the reduction in credits to rooftop solar owners, we're going to be paying significantly more than expected for electricity, AND we're going to making payments on the system installation. Grandfathering in systems only to 2020 doesn't do us a bit of good. We feel all rooftop solar installations made before the study and subsequent announced intention to reduce payments should, at the very least, be grandfathered in for the higher rates."

Name: Michelle Reagan
Submission Time: Nov 4 2022 3:47PM
Email: soleilseattle@gmail.com
Telephone: 208-630-3762
Address: 13266 Norwood Road
Donnelly, ID 83615

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "I have personally invested in solar panels and batteries for my home because I know we need more of our energy to be produced from clean energy and I want to be part of the solution. Climate change is a serious issue and Idaho has a rapidly growing population; however, Idaho Power is not aligned to be part of the progress that will move us in the right direction. Idaho Power has taken away incentives for individuals and small businesses to install solar despite the fact that it claims it will produce 100% sustainable power by 2045. Solar is currently only 5-6% of its current energy production, so it has a LONG way to go, and

is clearly not doing everything possible to move toward that goal. In fact, Idaho Power is de-incentivizing distributed solar power production. The problem is that Idaho Power is not incentivized toward what is best for Idaho - it is incentivized toward keeping the highest profit for the longest possible time. We need aligned incentives to move us into clean energy as quickly as possible. In states where energy production is deregulated, power companies work in harmony with individual solar producers (and batteries) to decrease the need for building new power plants and to help smooth out demand with batteries. This is the way of the future and Idaho Power is an obstruction to this. Idaho Power's monopoly is not in the best interest of our state as it is not acting as a good steward for future planning and progress. Thank you for your consideration in this matter. Regards, Michelle Reagan"

Name: John Boettcher
Submission Time: Nov 4 2022 3:12PM
Email: jbl69311@yahoo.com
Telephone: 619-888-7670
Address: 1809 W. Washington
Boise, ID 83702

Name of Utility Company: Idaho power

Case ID: IPC-E-22-22

Comment: "I recently moved back to Boise after 20 years away and was looking into installing solar on the house I bought here in the 80's. I attended the Thursday meeting hoping to get insight of how to proceed and maximize the benefits of my investment, totally ignorant of the crux of the hearing. From what I gathered from the meeting and talking with folks in the parking lot about the unlikelihood of this hearing having any influence on your decision I think my best bet would be to use the \$20,000 I had budgeted to spend on panels and instead use it to buy Idaho Power stock, perhaps even research what publicly traded solar installation company was doing a brisk business in Idaho and short their stock. It only makes sense. It seems the naïveté of the altruists has always been a bonus for those in power. I've recently heard two songs on pop radio saying in effect "We're all going to burn up anyway so let's get the party started now." The words seem prescient when I see all those giant pickup trucks on the road here and the #1. concern of folks these days is high gas prices. Oh to live in interesting times. John Boettcher "

Name: Vincent Santangelo
Submission Time: Nov 4 2022 3:37PM
Email: vinstster227@gmail.com
Telephone: 808-388-2299
Address: 6817 W Folk Drive
Boise, ID 83704

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "While it is reasonable for Idaho Power to reserve the right to modify stipulations of the Net Energy Metering program, proposed changes should be advantageous and at a minimum, fair, to existing and prospective on-site generation customers. Instead, it appears that Idaho Power is taking advantage to tip things in their favor, maintain control, and discourage homeowners from going solar when in fact, they have a fully renewable goal by 2045 and Boise plans to be fully renewable by 2035. Their most recent "study" is both flawed and biased, as has been made evident by the many testimonies and parties involved. "

Name: Matthew Lutz
Submission Time: Nov 4 2022 3:01PM
Email: mediclutz@gmail.com
Telephone: 208-309-1507
Address: 2128 N 15th St
Boise, ID 83702

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "Idaho power should do everything in its power to encourage the development of sustainable power sources to include solar on civilians homes. Any regulation that reduces the consumers investment into their homes even if they end up putting power into the system should be avoided. Reducing the rate that homeowners would recover when they put power into the grid should be voted down now. "

Name: Matthew Kohn
Submission Time: Nov 4 2022 3:29PM
Email: mattkohn@boisestate.edu
Telephone: 208-830-1634
Address: 520 E Jefferson St.
Boise, ID 83712

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "Hello, and thank you for reading my comments. I attended the evening hearing on Nov. 3, which articulated so well many of the arguments opposing adoption of Idaho Power's proposed compensation for electricity production via rooftop solar. I won't detail my views on those topics, except to emphasize: 1. An independent assessment of rooftop solar values is needed. As many have said, using Idaho Power's assessment is like having a fox propose security systems around a henhouse. There is an alternative assessment via Cross Border that PUC should consider. 2. Most rooftop solar production is during summer afternoons, when rates are highest. That seasonal value (not the yearly rate) should be considered. My final, lengthier comment relates to the seasonality of power production both now and into the future. For context, I am a University Distinguished Professor at Boise State, and one of my principal

research areas concerns climate change. In that last ~200 years, concentrations of greenhouse gases have risen to levels that, insofar as we can determine, have not been seen in 15 million years. These levels will continue to increase. Even with the development of new technologies, it will likely take hundreds of years, if not thousands, to return levels to normal – we are stuck with this for a very long time. Although there are impacts everywhere on Earth, there is both good news and bad news for Idaho’s power consumption and power production. The bad news is that we will need more power during hotter summers, while summertime hydroelectric power will decrease. Why will it decrease? Higher temperatures mean snow melts off earlier and faster in the spring and early summer, leaving lower water levels and diminished power production later in the year. This is often referred to as “agricultural drought”, because, even though the total amount of water we receive each year might not change much, its seasonal summertime availability decreases dramatically. The good news is that summertime is when solar electricity production is highest. That is, future decreases in summer hydroelectric power can be offset by increases in summer solar electricity production. This is an ideal solution for Idaho because we won’t be able to rely on wind (Idaho is not particularly windy, and wind speeds are not projected to increase into the future), and the only other major source of energy (fossil fuel burning) will make the problem worse. In that context, it is essential that Idaho incentivizes solar energy production. If individuals want to invest their capital in helping solve this increasingly alarming problem, Idaho should be helping, not punishing them. I get it that rejecting Idaho Power’s proposed plan might seem like it hinders progress on what we really need – a comprehensive power plan to cope with future power needs. But we know already that solar energy is urgently needed to solve this problem. It really is the best solution for the foreseeable future. Continuing the current compensation for rooftop solar is the best course, while adopting Idaho Power’s regressive plan is a truly bad idea. Thank you again for your patience and commitment in reviewing our comments and serving the public. -Matt"

Name: Virgil Moore
Submission Time: Nov 4 2022 3:34PM
Email: vbmoore5@msn.com
Telephone: 208-631-2917
Address: 11627 W Peak View Ct
Boise, ID 83709

Name of Utility Company: Idaho Power COmpany

Case ID: IPC-E-22-22

Comment: "We are recent roof top solar participants. I have reviewed materials before the IPUC concerning IPC request for a change in the value of roof top solar. Without getting into detail our system is exporting about 300 KWH per month so far. We plan to go to an electric vehicle in the future and hope that we can still produce surplus power for use on the power grid after adding that to our load. We currently use heat pump water heating to reduce our electrical power demand and have shifted that load to daytime to use our own solar generation. With that said as I understand the proposal IPC is suggesting a \$.022 value for this power we export vs. a straight exchange for power when we need to import from the grid. In reading IPC submissions the assumptions they use to value this power seem to be incomplete to all the current and future needs of the power users. Suggesting we are costing other users an increase in cost when we produce more that we use seems to ignore that dispersed solar generation can and does reduce peak load reducing the need for additional generation. We ask this case be continued to allow for further fact finding of the information before the IPUC. Thank You, Virgil and Becky Moore 11627 W Peak View Ct, Boise ID 83709 208-631-2917"

Name: Hank Clouser
Submission Time: Nov 4 2022 3:10PM
Email: Clouserh@gmail.com
Telephone: 208-630-4680
Address: 249 Ernesto DR
McCall, ID 83638

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "I personally invested in batteries and solar for my home because I see it as the right thing to do and it will be the way of the future. Individuals having solar and batteries has proven to work in states where power has been deregulated - for both the individuals and for the power companies. The additional power produced by individuals reduces the need for new power generation plants/facilities and the batteries help to smooth the power demand curve. Unfortunately, in states where energy is not deregulated, the power companies have no incentive to progress into this new world of cooperating with individual power producers. Thus, they are incentivized to keep the structure as is and block progress to protect their profits. If we want Idaho to move into the 21st century of energy production, we will need

more solar and batteries - both large and small. In order for that to happen, there needs to be more incentive than what Idaho Power is proposing. It's working for other states and will work for Idaho as well. We just need some cooperation and aligned incentives. Thank you IPUC for trying to make this work and filling in gap for Idaho not having deregulated Energy.

"

From: [PUCWeb Notification](#)
To: [Jan Noriyuki](#)
Subject: Notice: A comment was submitted to PUCWeb
Date: Saturday, November 5, 2022 7:00:21 AM

The following comments were submitted via PUCWeb:

Name: Suzanne Kromer
Submission Time: Nov 4 2022 6:01PM
Email: suza.vi@gmail.com
Telephone: 406-461-0596
Address: 111 S Randall St.
Boise, ID 83705

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "I am a resident of Boise and the recent purchaser of solar panels. I deliberated whether or not to make the large investment in solar, and support a local business in doing so, for quite some time. Ultimately, I chose solar in large part due to the current net metering program. It makes good sense for Idaho Power to utilize my excess solar during peak summer energy usage and return it via credit in kind. I urge the Idaho Public Utilities Commission to heavily review or reject Idaho Power's recent study, and instead find a solution that is fair to current and future solar owners. I fear that IPUC allowing Idaho Power its current request will kill solar when it's increasingly important to diversify our clean energy use. Thank you for your time. "

Name: Ryan Hart
Submission Time: Nov 4 2022 6:29PM
Email: ryanhart2003@gmail.com
Telephone: 253-224-7624
Address: 14026 W Bunkerhill St
Boise, ID 83713

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "I would like to expressing the urgency in protecting net metering and encouraging the Public Utility Commission to push Idaho Power to make a fair compensation structure for current and future solar generators. I recently installed a 10kw system and believe my investment is actually supporting your infrastructure. Based on more reputable studies performed the rate in which Idaho Power buys power from me should not be decreased, but rather increased at least 50%."

Name: Caleb Hansen
Submission Time: Nov 4 2022 7:42PM
Email: caleb@apsboise.com
Telephone: 208-321-2534
Address: 3163 E Fairview Ave #150
Meridian, ID 83642

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "Thank you for the opportunity to comment on this important issue. I am an Idaho Power customer who does not have solar, and I oppose approval of the Idaho Power Study. A reliable, unbiased, and comprehensive study is vital to good decision making, unfortunately this study comes up short of those requirements. It seems clear that this study was conducted with the sole purpose of justifying oversized rate cuts to small scale solar investors in our State. I was able to watch nearly 2 hours of the hearing on the 3rd, and was struck that while Idaho Power argues publicly that they pay solar-generating customers "at the expense of customers without solar"- not one of these customers allegedly bearing the cost of the program came forward to testify and ask the Committee for relief. As a member of this class of Idaho Power customers who do not have solar, I would like to submit that I am happy if some of my monthly payment goes to small scale solar investors in my community. Idaho Power customers as a whole clearly do not see this as a problem. Given the virtual unanimity of the public comments against this study, it would be difficult for me to square a finding in favor of the utility with the Commission's good reputation and history of dedicated public service. The public, and the Commission both deserve a more reliable and comprehensive study to guide the important decisions at hand. Maintaining just, fair, and reasonable rates for small scale solar investors in our community is the best way to incentivize building out the distributed infrastructure that will ultimately result in more efficient and reliable distribution for Idaho Power customers. Thank you for all the important work you do. With sincerity and respect, Caleb Hansen"

Name: Keith Talbert
Submission Time: Nov 4 2022 11:40PM
Email: keitht2@msn.com
Telephone: 208-455-2727
Address: 2410 S 10th Ave
Caldwell, ID 83605

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "I am asking you to please review carefully both Idaho Power's proposal and the 3rd party review of their data. I personally don't have the knowledge base to make an accurate evaluation of the vast differences in the two reports. But I do find the huge decrease in what Idaho Power is suggesting I be reimbursed for my net metering would indicate something is amiss. I don't understand how the rate they've been paying could possibly have been so

overpriced in the past. It seems that production costs would only have increased over the years like almost everything else, including the rates they charge. I'd like to ask the PUC to evaluate a fair price for both Idaho Power and the producers of home solar like myself to get a fair price for the electricity we produce. I'd like that price to encourage ongoing production of environmentally sound electricity. And I'd like for that to be an equitable price for everyone. Idaho Power's single study does not seem fair and they shouldn't be able to single handedly control how solar energy is valued. "

Name: Richard Marsh
Submission Time: Nov 4 2022 11:54PM
Email: rich_marsh@me.com
Telephone: 208-319-4175
Address: 6086 N Bennington Way
Boise, ID 83713

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "I know that Idaho Power believes they are the power in Idaho. I hope that the Idaho utilities commission does not believe the same thing. "Power to and for the people" should be utilities commission's mandate. It is bad enough that Idaho power does not have to pay residential providers for the excess power they produce. At an absolute minimum they should have to Match kilowatt for kilowatt for the power produced by residential homeowners. After all, they are reselling the power for at least that much, more if they export it to other states. Any analysis performed by Idaho power or their flunkies should be scrutinized very carefully, as it is likely very biased. Common sense dictates that Idaho power should give credit on at least a one to one ratio. I defy anyone to argue the fairness of that. Moreover, I would argue that they should pay for excess power generated by any provider. After all, they are reselling that power. Does that make sense to incentivize individuals to create power for the greater good of all?"

Name: Edmund Bogert
Submission Time: Nov 5 2022 12:19AM
Email: rockybogert@gmail.com
Telephone: 208-867-3316
Address: P O Box 1477
McCall, ID 83638

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "Comments on Reference case Number IPC-E-22-22 VODER Study Dear Idaho Public Utility Commissioners, This case will provide the small power generator more certainty in their decision to make a capital investment in solar energy. The Voder Study seeks to create

a clarification of the Distributed Energy Resource(DER) within the rate classes. It also attempts to set the parameters for reimbursement for excess power provided to Idaho Power by a DER. I believe the study fails to take into account several benefits of a DER in providing a peak power generation source and minimizes the monetary benefits to IPC and its ratepayers. I strongly agree with the excellent analysis presented by the Idaho Conservation League (ICL) in testimony to the Commission. I would ask that the IPUC direct Idaho Power to work with ICL and other professional energy consultants/interested parties in developing a reasonable reimbursement rate structure which will encourage its customers to make capital investments in DER's. Additionally, I would encourage Idaho Power to review its business model of centralized generation, transmission and distribution. It should consider modifying it to include distributed generation, storage and aggregation. The technology to manage distributed generation, storage and aggregation exists in other areas around the country. Thank you...

Edmund A Bogert III "

Name: Kurt Fesenmyer
Submission Time: Nov 4 2022 9:52PM
Email: kurt.fesenmyer@gmail.com
Telephone: 208-949-0202
Address: 1507 N 25th St
Boise, ID 83702

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "Idaho Power has a vested business interest in minimizing the compensation provided to distributed, on-site energy producers. I encourage the commission to provide oversight and regulation of Idaho Power and consider the VODER study along with other independent studies and perspectives, such as the Crossborder Energy study."

Name: Thao Nelson
Submission Time: Nov 4 2022 5:32PM
Email: thaothanh.nelson@gmail.com
Telephone: 518-888-5662
Address: 14023 W Stockwell St
Boise, ID 83713

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "We need to protect net metering and provide fair compensation for current and future homeowners of solar generators. It's the fair and right thing to do. We need to protect our future "

Name: Thomas Weingartner
Submission Time: Nov 4 2022 8:58PM
Email: t.weingartner@yahoo.com
Telephone: 907-388-0414
Address: 307 N Picardy Pl
Boise, ID 83706

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "I am a resident of Boise, Idaho, an Idaho power customer and installed rooftop solar on my home over 5 years ago mainly because I could afford to do so and because I see the need to do my part to enhance the use of renewable energy throughout the US. I also live on my retirement investments, some of which include Idaho Power. I am also a strong supporter of Idaho's economy, especially its small business owners and believe that the national security of the USA requires extensive development of renewable energy sources. I am also very concerned about a warming climate and the need for this country to move as quickly as possible to generating power from renewables, including solar. I am concerned about a warming climate because it will negatively impact our economy. In addition, Idaho employs over 2100 people in its power generation sector, of which nearly a third are employed in solar power generation. I'm disappointed in Idaho Power's recent report, which is opaque to most customers, considered biased in Idaho Power's favor, and antithetical to small businesses. An understandable and unbiased report was requested by the PUC several times over the past few years and Idaho Power has not produced such with the latest version. The population of Boise is growing and businesses are moving here who will use enormous amounts of energy. You should be encouraging people to add to the grid instead of making it less financially attractive. I understand you are beholden to stock holders (including myself), but the bottom line is not merely about money. It's about our health and our future. I understand that only two people will decide this matter, who were appointed by the Governor Little who received \$10,000 in campaign contributions from Idaho Power. I hope that this donation does not affect the PUC's decision. Our young people are watching what we do. Please do the right thing and support local jobs, a diverse economy powered by small businesses, show our youth that you care about THEIR future and assure Boise's ability to provide all the electricity needed in an environmentally healthy manner. "

Name: Drew Izatt
Submission Time: Nov 4 2022 10:57PM
Email: drew@directcom.com
Telephone: 208-240-7275
Address: 3021 Trevor St.
Pocatello , ID 83201

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "I do not support the attempt by the Utility companies to reduce the amount of

credit now being given for electricity generated from my rooftop solar. It seems to me that a big push was made by the government and even by the utility companies to encourage investment in private solar power generation, but now that myself and others have made that investment, an attempt to reduce the incentives is disingenuous and hypocritical. I urge that a decrease of any amount is not approved. "

Name: Doug Schulze
Submission Time: Nov 4 2022 6:12PM
Email: doogiesd@gmail.com
Telephone: 858-877-3684
Address: 3150 S Avondale
Nampa, ID 83686

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "I support Idaho power here. My solar is a generation source and Idaho power shouldn't have to "pay" retail for my generation but wholesale as it would from any other entity. Sure it's a nice perk for the consumer but that's not commerce in which I'm engaging."

Name: Alyson Martin
Submission Time: Nov 4 2022 10:47PM
Email: musical52@hotmail.com
Telephone: 208-484-3241
Address: 3716 E Timbersaw Dr
Boise, ID 83716

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "I installed my residential solar panels in 2016, so am apparently grandfathered in and may avoid being dragged into Idaho Power's latest scheme to penalize solarizers. Nevertheless, I am outraged by Idaho Power's backward thinking on net-metering. IP gives a lot of lip service to promoting sustainability but turns right around and finds a way to disincentivize solar. It is very sad. Idaho Power is in a position to help solve the climate crisis, but its backward approach prevents that from happening. The ever increasing droughts, floods, and fires that are proof of the climate crisis just don't seem to register with this company. It's all about money, and how to squeeze more of it out of those who are trying to be part of the solution. I sometimes think Idaho Power resents residential solar and wants solar all for itself. In any event, the company is actively advancing a world for our children that will likely be unlivable. What a legacy."

Name: Dennis McGonigal
Submission Time: Nov 4 2022 8:25PM
Email: dennismcgonigal@gmail.com
Telephone: 208-610-4744
Address: 10201 State Highway 75
Bellevue, ID 83313

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "The recently completed study by Idaho Power with regards to net metering is incomplete. The study failed to include all the benefits of solar, and how net metering is a large contributor to those benefits. Net metering creates more solar power, it untaxes and actually aids the power grid, and safety, while very important, is not at issue with this technology. This is good clean safe energy. Something we are all going to need more of under world conditions and energy strains of the future. Please consider the good of solar, as the document you are going to read is not a fair or unbiased document, and does not fully examine all the benefits of solar or net metering. Thank you for your consideration."

Name: David Garman
Submission Time: Nov 4 2022 6:22PM
Email: dkgarman@gmail.com
Telephone: 208-598-4746
Address: 4923 E Sagewood Dr
Boise, ID 83716

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "I am an Idaho resident and residential ratepayer. Idaho Power is my energy provider. I am now retired, but I was an Assistant Secretary and the Under Secretary of Energy at the U.S. Department of Energy during the Bush Administration. Subsequent to that I was Chair of the Electric Power Research Institute's (EPRI) Advisory Council, and I served on several Advisory Boards to Universities, National Labs and the National Academies, mainly in roles pertaining to electric power generation, transmission, distribution and use. I also own a grid-connected solar PV energy system for my home in Boise, and I am also in the process of installing a grid-connected solar PV energy system for my vacation home near Riggins, Idaho. I value the "grid services" I enjoy as a solar homeowner, and I would agree that "inflow" and backup power to meet my home's energy requirements is something I should pay my fair share for. At the same time, I am mindful that I am personally capitalizing a power generation resource that is valuable to other ratepayers (and society as a whole) by virtue of its ability to reduce greenhouse gas emissions, to promote grid resilience and reliability, and to help keep power affordable for all ratepayers. To get to the point: I have read Idaho Power's VODER study, and in my opinion, it undervalues excess rooftop solar in several significant ways that were well summarized in Crossborder Energy's independent review dated September 20, 2021, which I also read. I strongly urge you to consider the points in the independent review, and to

ensure that the scope of analysis that will inform a rate case will contain all the criteria raised in that review. Beach and McGuire did a superb job with their analysis, and the Idaho PUC should take full advantage of this important work. Thank you for the opportunity to comment. "

Name: Kathleen Fahey
Submission Time: Nov 4 2022 5:29PM
Email: kateyfahey@gmail.com
Telephone: 208-559-1278
Address: 2808 S Colorado Ave
Boise, ID 83706

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "Please consider any decisions that could negatively impact Idahoans choices to implement energy sources for the future. More and more people are switching to electric cars....we need more options for energy sources that will be cost effective, not fewer in the hands of a monopoly. Shame on you if you don't consider my children's and grandchildren's future clean air and and transition to a different world than you and I have lived in!!!"

Name: Greg Nesslage
Submission Time: Nov 4 2022 7:34PM
Email: swenlok@msn.com
Telephone: 208-353-9473
Address: 11776 Altamont St
Caldwell, ID 83605

Name of Utility Company: Idaho Power Company

Case ID: IPC-E-22-22

Comment: "I purchased solar for my home to help the environment and the primary selling point was that the cost of the loan would match what our current power bill is, so the cost would be a wash. If Idaho Power changes the reimbursement rate for 1kwh that I generate and push back to them, then I would have to pay Idaho Power to get back some of the power I produced for them. This is ONLY to increase their profits and does nothing but hurt the consumer. Plus, why would I not be fairly compensated for the power that I "sold" to them just as they wish to be fairly compensated for the power they sell to me?"

Name: Alex Brun
Submission Time: Nov 4 2022 8:31PM
Email: alexjbrun@gmail.com

Telephone: 360-359-3700
Address: 744 Deer Forest
McCall, ID 83638

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "Case Number: IPC-E-22-22 November 4th, 2022 To Whom It May Concern:
After reviewing the VODER study, I am writing to strongly advocate the commission to require one-to-one net energy metering for all rooftop solar. In order to install rooftop solar, I had to make a significant upfront investment that made economic sense based on Idaho Power's net metering compensation rates. A retroactive change to existing systems is unfair and poor business. Idaho Power should honor the rates that made rooftop solar installation doable for existing systems like ours. Furthermore, net energy metering is clearly the fairest way to compensate ALL households that install rooftop solar (current and future). It is ludicrous that Idaho Power could adopt a system that charges consumers more for using power and pays them less for the power that they generate. Individual rooftop solar installations should not require a complicated understanding of energy pricing and energy exchanges, but rather a fair and reasonable expectation that what energy you put into the system, you can later draw back out. It is especially reasonable due to the fact that we are not paid for our excess energy generation, rather it just accumulates as a credit. The paperwork, metering, and tracking required for the complicated net billing proposals is simply unnecessary. Although Idaho Power has systematically worked to make rooftop solar less appealing to consumers over the past decade, rooftop solar is a benefit to the community. It offers resilience to the power supply and reduces our reliance on greenhouse gas generating power sources. This, in turn, helps reduce the potentially cataclysmic impacts of climate change on our town, state, country, and world. Rooftop solar also allows us to use areas already built on to generate power without impacting new land. Idaho Power and the Public Utility Commission should be doing everything in their power to encourage rooftop solar installation. This includes fair and simple pricing for rooftop solar, i.e. net energy metering. Please act in the best interest of the public, consumers, and the environment and continue one-to-one net metering credits.
Sincerely, Alex Brun "

Name: Carol Klug
Submission Time: Nov 4 2022 6:31PM
Email: joescaroll@gmail.com
Telephone: 208-631-3352
Address: 520 N 1st St W
Idaho, ID 83628

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "PUC: Please understand Idaho Power is trying to monopolize all power in the state and force people to comply to their price rates even though they did not take everything into account on their study! We solar owners have installed solar at 100% cost to ourselves.

ALL of our extra power that goes back in the grid helps Idaho Power during high usage and is a benefit to them! To not pay fairly for what we generate yet want a full price on what they generate is a ripoff! We solar owners have an economic impact that all goes into the state, jobs, tax money etc. All a benefit for our state. Plus, we solar owners are doing our part to help our state go "green", a goal Idaho Power themselves should be striving for and encouraging! Please don't let them take us backward on progress and make solar a financial burden for the average Idahoan! Thank you, Carol Klug. Proud solar owner who wants to reduce my carbon footprint!"

Name: Nick Romans
Submission Time: Nov 4 2022 6:09PM
Email: the.big.jfc@gmail.com
Telephone: 208-555-5555
Address: 896 W BACALL ST
Meridian, ID 83646

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "I am writing in opposition of Idaho Power's proposal to cut compensation rates for Idaho residents with excess solar power. Idahoans should be given fair compensation for providing power back to the grid for use by others. I'd also like to highlight how Idaho is a state with a great number of natural resources and wilderness enjoyed by so many outdoor enthusiasts - from both in and out-of-state. If there's a chance Idaho Power can provide the opportunity for Idahoans to reduce the need for fuels which are unfriendly to the environment, I think they have an obligation to do so."

Name: Tyler Harris
Submission Time: Nov 4 2022 8:48PM
Email: tjharris@gmail.com
Telephone: 206-819-5378
Address: 646 S. Granite Way
Boise, ID 83712

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "I am writing to urge the PUC to reject Idaho Power's attempt to discount net metered home solar generation. Please protect this resource and allow the Idahoans that depend on solar generation to receive their fair repayment. We need to do everything possible to incentivize clean energy, not disincentivize it. This would stifle solar generation in a region that has tremendous potential, and at the time we need it most. If grid maintenance cost is truly the issue, there are ways of spreading that cost around all utilizers that do not unfairly penalize solar producers. "

Name: Barbara Thiele
Submission Time: Nov 4 2022 5:13PM
Email: bthiele3@gmail.com
Telephone: 208-347-2168
Address: PO Box 302
New Meadows, ID 83654

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "Dear Commissioners: I am writing to urge you to look beyond the study submitted by Idaho Power (IP) and more deeply into the full value of benefits from privately owned on-site electricity generation. The full spectrum of benefits from on-site generation to customers and non-customers should be considered, not just the costs and benefits to Idaho Power. Power production is a service not just a business. Furthermore, I urge you to recognize the use of faulty, outdated data and weak, outdated assumptions in the IP study. Do not allow Idaho Power to rush or pressure you into making a decision based on poor information and assumptions. Demand better. Finally, I ask that you consider the hardship IP is asking you to place on customers who have taken on great personal expense to assist IP in moving toward cleaner production of electricity and to help themselves financially. I would like to share my personal story as I know there are others like me. My husband and I are retired schoolteachers. My 10-year tenure here in Idaho produced an insufficient pension, but with my husband's pension, we were comfortable enough. Then in 2019 he was diagnosed with dementia. I was devastated and petrified. I knew all his pension would soon have to go to his long-term care. I had to find a way to afford to live on my own. We had built our small house so that solar would someday be feasible as we had wanted to do our part to reduce energy emissions and build a better world for our grandkids. So, I used a chunk of our savings to add solar to the house knowing it would help me save money. I was not able to afford a storage battery and I need Idaho Power as back-up. The investment has helped me stay in my home. This was in September 2020. There is much more to my story, but the point is I made a hard financial decision to benefit myself and do my part to help contribute to sustainable energy solutions. It would not be fair to me or others like me to slash compensation rates based on faulty data or faulty assumptions. Generating decentralized clean energy is part of the solution to not only climate challenges but to our vulnerable energy system, and I believe it is more helpful to Idaho Power than they have acknowledged. After all, they are getting free energy from us. Which brings me to the value derived from privately generated electricity to everyone. The IP study either ignores or does not fully evaluate these benefits. These benefits include 1.) Greater energy resiliency for society as a whole. 2.) Less expense to all customers for new power plants and transmission lines. 3.) Less maintenance cost for IP as private people must maintain their own systems and less IP infrastructure is needed. 4.) Our electricity generation reduces the risk of volatility in cost of other energy sources and 5.) We reduce the cost, both financial and environmental of carbon emissions to Idaho Power and our communities. Finally, there may be other benefits of which I am not currently aware, and I ask you to look carefully. I know others more educated in these matters will outline to you where IP has used poor or outdated information in making their report, so I will not belabor that. I hope I have made those aspects of concern to me and others like me clear to you, and I trust you will be guided by what is fair, true and good for the citizens and customers of the power company.

Thank you for your consideration of my letter. Respectfully, Barbara Thiele"

Name: Andrew Piatt
Submission Time: Nov 4 2022 5:52PM
Email: shop@tri-city.com
Telephone: 509-396-6339
Address: 7870 E Bell Canyon Rd
Harrison, ID 83833

Name of Utility Company: Kootenai Electric Cooperative

Case ID: IPC-E-22-22

Comment: "Individual power generation projects help provide resiliency to the grid, and combined with local battery storage options, can even help to stabilize the grid in times of stress, saving both parties money and with home owners working cooperatively with the utility districts rather than fostering an adversarial relationship between the two. By disincentivizing individual investments in solar/wind projects, you effectively stifle continued private investment in power generation and storage, create a disincentive to work with utility districts happy to buy up privately generated power at reduced rates, and slow any movement toward a distributed power generation grid. See the Emergency Load Reduction Program (ELRP) project in California (PG&E) or the PV-Shift project in Germany (TransnetBW) for examples of utility districts working WITH customers to their mutual benefit instead of against customers who invest in these projects. Rather than ending net metering, let's instead work together to save both parties money and provide a more resilient grid for everyone!"

From: [Laura Hanks \(laura.hanks7@gmail.com\)](mailto:laura.hanks7@gmail.com) Sent You a Personal Message
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Monday, November 7, 2022 12:03:38 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,

Laura Hanks
6281 SE Deering Ct
Milwaukie, OR 97222
laura.hanks7@gmail.com
(555) 555-5555

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: Monday, November 7, 2022 1:00:07 PM

The following comment was submitted via PUCWeb:

Name: Lila Dressen
Submission Time: Nov 7 2022 12:11PM
Email: lstamps2@aol.com
Telephone: 208-948-3756
Address: 4453 N 2157 E
Filer, ID 83328

Name of Utility Company: Idaho Power

Case ID: IPC-E-22-22

Comment: "Idaho Net Metering Rate Proposal: As someone who just installed solar panels on our roof the idea that the net metering benefit would be slashed immediately is distressing to say the least. Feels like Idaho Power has big self interest in making solar panels a zero benefit to install. The high cost of installation with the hope of a 10 year break even is already marginal. Reducing the benefit of net metering with a pay back somewhere out to 20 or 30 years will have the public stop purchasing altogether, Who benefits from that? There is no question a third party review needs to be required to determine the actual benefit Idaho Power is receiving from roof top solar. Someone needs to look out for the consumer and this decision shouldn't be based on a study done by the organization who stand to benefit handisomely. Thank You!"
