

From: [Steven Bravo \(idabrav@live.com\) Sent You a Personal Message](mailto:Steven.Bravo@live.com)
To: [Jan Noriyuki](#)
Subject: IPC-E-22-22 Public Comment
Date: Tuesday, November 15, 2022 12:02:41 AM

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Dear Idaho Public Utilities Commission,

Idaho power is trying to protect profits. If they are to get serious about a clean environment they need to step up to the plate.

Please don't let them make their own decisions on this matter!

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,

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IPC-E-22-22

David Chamberlain
Eagle, ID

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IDAHO PUBLIC
UTILITIES COMMISSION

Summary

I oppose the Idaho Power VODER study & proposal, but I do have some alternative proposals to consider

My Solar Experience

I 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 process - 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) that 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 between generation and usage.

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 would be subject to the lower ECR rate. This last Table

shows that 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 2 concrete results of this proposal as it presented.

- 1) If adopted as is, this proposal will quickly kill the residential solar industry. Many analyses done by providers to residential customers show current payback in the 9-12 years range. For me, this was marginally acceptable because of my interest in helping the environment. This proposal makes those payback years double or triple depending on the final measurement and ECR adopted. A 20-30+ yr payback is totally outside any reasonable range and will be rejected every time. No one will invest.
- 2) This proposal will drive behavior change for residential players. A behavior change that 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 during those peak production 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 VODER proposal completely screws up the incentives for the behavior Idaho Power wants. If one person does this, me for example, you may say - we don't care. What if 10,000 of us did it, would you care? Idaho Power says solar generators 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 IDAHO POWER selectively choosing to add or ignore benefits and risks.

MISSING ELEMENTS IN THE VODER STUDY/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 in any detail. 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 or the ECR, why not for example - a fixed charge based on your

system size. Say \$5/month 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 it's 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 chose not to. 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 financial customer service employees for a cost comparison between hydro, coal, gas, wind, solar in various forms, etc. The 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 though, so I won't. But it did make me wonder about 2 related things.

- a) The 2 cent statement that go around for a solar ECR - 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 cost effectively replace them?
- d) Maybe the answers to these questions are obvious, but they weren't to me. Some straightforward disclosure of costs would help - even with its time of ay, 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. It was fairly vague from both Idaho Power and industry providers. My wife and I 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 website 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. And Industry partners should get a signed waiver saying the buyer understands. Admittedly, I did not do

enough homework. It was on the edge of acceptability 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 VODER proposal "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) If some version of this proposal is accepted, please grandfather in to the current situation a second group. Anyone who installed between Dec 2019 and your 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.
- 4) 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.