

**From:** [Bill Goodnight](#)  
**To:** [Jan Noriyuki](#)  
**Subject:** Comment on IPC-E-23-11  
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*The IPC web page is confusing as to how to comment on a current case. Please accept this as my formal comments on the subject General Rate Increase proposal by Idaho Power Co.*

My concern with the proposed rate increase is that established homeowners and utility customers are being asked to subsidize new growth and development.

In the September 24<sup>th</sup> edition of the Idaho Press, Idaho Power President and CEO Lisa Grow said, "This case is largely focused on the infrastructure additions that have been necessary to reliably serve our growing customer base." In other words, established rate payers are being asked to subsidize growth and development.

The Commission should require impact fees, including meter installation surcharges or a graduated rate system with new customers paying a higher rate to offset the infrastructure costs of new development.

Impact fees have been accepted in many other areas of public infrastructure and the concept of priority for established users is a major tenant of Idaho Water Law: "First in time, first in right"!

It is time for the Idaho Public Utilities Commission to join efforts to properly place the burden of growth related infrastructure costs on those directly benefiting from such growth; namely developers and new customers.

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