

From: Chris Hecht >
Sent: Monday, May 22, 2023 8:52 AM
To: Chris McEwan >; Jan Noriyuk
Subject: IPC-E-22-22 OR IPC-E-23-14

Jan,

I have inserted these two comments below that were attributed to IPC-E-22-22, that I believe should be applied to the newer case IPC-E-23-14 despite being labeled as comments for the 2022 case.

Both comments were submitted after the 2022 case was closed and after the newer 2023 case was opened. Both cases are regarding the new rates for non-legacy customers.

05/18/2023 [COMMENTS 1.PDF](#)

05/19/2023 [COMMENTS 1.PDF](#)

The following comment was submitted via PUCWeb:

Name: Luke Landriani
Submission Time: May 18 2023 2:38PM
Email: llandriani@geotekusa.com
Telephone: 208-577-1205
Address: 548 W. Criterion St.
Meridian, ID 83642

Name of Utility Company: Idaho Power

Case ID: ~~IPC-E-22-22~~ **IPC-E-23-14**

Comment: "Seems like with this change, it will hinder people to make the move to solar. Under the current net metering system, it barely made since to make the move to solar last year. This seems counterintuitive to Idaho Power and IPUC's goals of going green. How are they going to incentivize people to make the switch? Solar is a consumer choice and this would be a detrimental hit to the budding local solar industry and take away our right to produce our own energy at a fair price."

The following comment was submitted via PUCWeb:

Name: Mauricio Steffen
Submission Time: May 19 2023 10:24AM
Email: mauriciosteffen@live.com
Telephone: 208-703-0255
Address: 17323 North Ronan Avenue
Nampa, ID 83687

Name of Utility Company: Idaho Power

Case ID: ~~IPC-E-22-22~~ **IPC-E-23-14**

Comment: "Don't allow Idaho Power to change the on site generation rate. This will further discourage homeowners from adopting solar as a renewable power source for their homes."

The following comment was submitted via PUCWeb:

Name: Phillip Pickman
Submission Time: May 19 2023 1:58PM
Email: PPickman@ix.netcom.com
Telephone: 208-576-6968
Address: 5542 W DURNING DR
EAGLE, ID 83616

Name of Utility Company: Idaho Power

Case ID: IPC-E-23-14

Comment: "I have a roof top solar system installed on my home. I purchased this home in May 2022. The previous owner had installed the roof top solar system. I considered the roof top solar system a feature of the house, and bought it in good faith, expecting that the on-site generation agreement with Idaho Power would continue.

I received a letter dated May 1, 2023 stating that Idaho Power proposes to change its on-site generation offering for systems installed after Dec 20, 2019, which are considered "non-legacy". Idaho Power tells me their records show that my system was installed March 2020.

If the Idaho Power change proposal is accepted, I urge you to make it effective for systems installed after the acceptance date. The systems already installed depend for their financial justification on the then-existing Idaho Power compensation structure for on-site generation. It is unfair to make the change effective for systems already installed in good faith prior to the date a change is approved.

Thank you for considering this view. I hope that you agree with it."

The following comment was submitted via PUCWeb:

Name: Ben Price
Submission Time: May 19 2023 4:35PM
Email: price.bh@gmail.com
Telephone: 208-340-9893
Address: 15 S Ruby St
Boise, ID 83706

Name of Utility Company: Idaho Power

Case ID: IPC-E-23-14

Comment: "Hello,

Just read (and re-read because it was not very clear) the letter from Idaho Power regarding changing the compensation for on-site solar.

If I'm understanding correctly they are going to quit paying for electricity we provide if it exceeds what we use that month. (In cell phone terms, our minutes will no longer roll over.)

Idaho Power will use (sell) the power I provide, regardless of whether it is more or less than I consume that month. This change of "compensation structure" is nothing more than a 30% rate hike on me to put more money in their pocket. It is penalizing me for installing solar panels.

If we are serious about incenting on-site residential solar, which would be good thing for everyone, this greedy cash grab by Idaho Power is a bad idea. Please disallow, or vote no, or whatever the equivalent steps are on your side.

Regards,
Ben Price"

The following comments were submitted via PUCWeb:

Name: Morgan Dean
Submission Time: May 19 2023 5:31PM
Email: Butterfly5500@hotmail.com
Telephone: 208-406-1922
Address: 20182 COLEBROOK AVE
Caldwell, ID 83605

Name of Utility Company: Idaho power

Case ID: IPC-E-23-14

Comment: "The proposed solar situation is completely unfair and not environmentally friendly. I completely disagree with this proposal."

Name: Darrin Grinder
Submission Time: May 19 2023 7:53PM
Email: grindersgrounds@gmail.com
Telephone: 208-409-4252
Address: 420 W Edwards Ave

Nampa, ID 83686

Name of Utility Company: Idaho Power

Case ID: IPC-E-23-14

Comment: "I am writing to disagree with Idaho Power's proposal to lower compensation/metering for home solar power generating customers such as myself. First, it is self-serving for Idaho Power to generate its own study with a foregone conclusion—that solar generators essentially need to pay more for electricity than they do currently. Second, a more fair report comes from the Crossborder, which states that we should be compensated MORE than current rates (18c, vs the current 8-10c, vs. IP's proposed 3c). Third, reducing the net metering will likely result in fewer businesses and families adopting solar; and every reasonable person knows that we need to be adopting MORE alternative energy sources, not fewer. Third, Idaho Power's rates will be increasing do, at least in part, an aging and over-burdened electricity infrastructure. Solar generators should be rewarded for relying less on that infrastructure and, indeed, propping it up. Many of us have adopted solar power at least in part to be less dependent on a system that will become increasingly glitchy (we have a battery and have "islanding" capability).

Again, my wife and I are strongly agains this proposal from Idaho Power. In a state that lacks publicly-owned electricity and yet allows for a powerful monopoly like Idaho Power to exist, the Public Utility Commission's only responsibility is to protect the consumer who has no other choice but to use Idaho Power. Has Idaho Power shown that it is not profitable? In fact, it continues to be a very profitable company, at least in part on the good will of families who adopt solar energy.

We are by no means a rich family. We live in a fifty-year old home. We both are professionals who work full time for non-profit industries. We invested in solar for the good of the world, and we were able to justify this, in good part, on the current net-metering rates."

The following comment was submitted via PUCWeb:

Name: Kyle Wheatley
Submission Time: May 20 2023 10:14AM
Email: kjwheatley@yahoo.com
Telephone: 208-757-0430
Address: 744 W. 100 N.
Blackfoot, ID 83221

Name of Utility Company: Idaho Power

Case ID: IPC-E-23-14

Comment: "I just had solar power installed on my house and although I understood that there was no contract with Idaho Power to always pay one for one on the excess power generated I think they should not be able to basically completely negate any benefit that I receive for going solar. They are offering to

pay a premium for electricity generated during so called peak hours of 3 pm to 11 pm which is not peak generation time. And on top of that they would only pay around 40% of the existing rate during the peak generating hours of the day. I am not advocating for the continuation of the one for one program and I realize they have expenses and need to make a profit but to gut the program like the proposed plan is not even close to being fair to the customer. It also will make it a lot harder for the consumer to benefit from his investment in solar. I would think under the existing circumstances Idaho Power and Government would want to encourage the investment in solar. I understand there are government programs to encourage solar investment but I will not qualify for much of that because of my income. Had I known beforehand about the proposed plan I seriously doubt that I would have had solar installed. Grandfathering solar that is up and running by the approval date would be more reasonable and fair.

Thank you
Kyle Wheatley"

The following comment was submitted via PUCWeb:

Name: Alyssa Knesek
Submission Time: May 20 2023 11:35AM
Email: aknesek@gmail.com
Telephone: 208-181-9890
Address: 5943 E Foxgrove Dr
Boise, ID 83716

Name of Utility Company: Idaho Power

Case ID: IPC-E-23-14

Comment: "I'm writing regarding the proposal to change credit rates for customers with solar panels. I'm opposed to this proposal. There is no reason why credit should change and the reasoning behind the proposal is not outlined in the letter from Idaho Power. Having the credit for the electricity my home generated reduced and increasing my electricity bill seems like nothing more than a money grab and a bait and switch and punishment by the power company because I'm not entirely reliant on their supply of electricity. Please deny this proposal."

The following comment was submitted via PUCWeb:

Name: Kevin Farley
Submission Time: May 20 2023 4:52PM
Email: kbfarley@frontiernet.net
Telephone: 712-371-3604
Address: 1110 Saddle Horn Ln
Parma, ID 83660

Name of Utility Company: Idaho Power

Case ID: IPC-E-23-14

Comment: "It is my request if the proposed changes for compensation that Idaho Power wants to implement, all solar systems installed prior to the effective date of any changes be grandfathered in. We installed a solar system in January 2023 and the main selling point was that all excess energy would be banked for our use. It appears that Idaho Power only wants to compensate us with a fraction of the total value that we produce and put into the grid. Idaho Power should not be allowed to profit at our expense. Thank you."

The following comment was submitted via PUCWeb:

Name: John Staebler
Submission Time: May 21 2023 10:45AM
Email: johnstaebler@gmail.com
Telephone: 208-590-2765
Address: 1927 Stonetree Dr
Mountain Home, ID 83647

Name of Utility Company: Idaho Power

Case ID: IPC-E-23-14

Comment: "IDAHO
So will this pay me for my overages? At the end of monthly cycle total kWh left after usage?

I rely on my storage of kWhs from the winter months when we are gone to use during the summer months while we are hear in Idaho."

The following comment was submitted via PUCWeb:

Name: James Giuffre
Submission Time: May 21 2023 2:47PM
Email: jgiuffre1@gmail.com
Telephone: 208-867-1097
Address: 352 N Panorama Place
Boise, ID 83702

Name of Utility Company: Idaho Power

Case ID: IPC-E-23-14

Comment: "First, the letter sent out by Idaho Power on May 1, 2023 needs to be resent in plain language. The power industry jargon is unintelligible to most readers. For example, the definitions of and rationale for changing from net monthly to real time net billing and the term "time differentiated export credit rate (ECR)" is totally confusing and not fair to the average reader to understand. Fix it and have IP send out a letter that is in plain language to explain their rationale for the change and what those jargon terms actually mean.

Second, Idaho Power commissioned a study that dramatically lowers the rate of credit per Kwh. It is an industry biased study. Idaho Power's study comes up with a Kw/hr credit of \$3.8 cents, and an independent study by Crossborder Energy comes up with \$18.3 cents per Kw/hr. Clearly the PUC needs to examine both studies and determine why there is such a wide variation in credited rates per Kwh in the Idaho Power study vs the Crossborder Energy study and come up with a fair rate for crediting solar consumers who put energy back into the grid. Thank you for the opportunity to comment."

The following comment was submitted via PUCWeb:

Name: Kevin Marsh
Submission Time: May 22 2023 10:52AM
Email: kevin.r.marsh@gmail.com
Telephone: 208-479-4908
Address: 111 Prairie Sun Road
Bellevue, ID 83313

Name of Utility Company: Idaho Power

Case ID: IPC-E-23-14

Comment: "I am a customer of Idaho Power, and I oppose Idaho Power's proposal to end net metering for distributed production of solar power. The study conducted by Idaho Power in 2022 does not sufficiently account for the value of distributed production by understating the long-term benefits of offsetting power production at peak summer demand, reducing loss from transmission, and helping to build a more resilient power grid for future years. Any adjustments in compensation for household solar production need to more completely take these benefits into account and compensate those homeowners for their investments. "

The following comment was submitted via PUCWeb:

Name: Scott Burlingame
Submission Time: May 22 2023 1:45PM
Email: scott.burlingame@gmail.com
Telephone: 208-389-8085
Address: 3520 Kingswood Drive
Boise, ID 83704

Name of Utility Company: Idaho Power

Case ID: IPC-E-23-14

Comment: "Once again Idaho Power (IP) is advocating for a change in the relationship between the power company and independent solar producers. Unsurprisingly, the proposal skews the facts and the money to IP's benefit. I am writing to the IPUC because it is the IPUC's role to enforce the balance between the public interest and the need for the electricity generating monopoly to remain viable.

We can no longer afford to be indifferent to the sources of our electricity. Climate change has become revealed as a clear and present threat. Building a livable future will require sources of energy that do not, as a cost of their use, mean more contributions to warming. The construction of a green future has started, but we are way behind. In the short term we need to seize every opportunity. One significant and growing contribution is private businesses and private citizens spending their own money to expand solar generation. IP says it will spend over \$200 million to the next 20 years to obtain 120MW of power for Idaho. They evince no particular concern as to the source of this power.

The population of the United States and the world continues to grow. The need for energy will continue to grow. It is unquestionably in the interest and to the benefit of the country as a whole that new electricity generation not contribute to further climate change. In the past when national need arose citizens stepped up—there were paper drives, rubber drives, rationing, and bond drives to mention a few—and acted on their patriotic concern for the country. Many of us who up-fronted tens of thousands of dollars hope to at least break even in the long term, but for many of us it has been a patriotically motivated attempt to contribute to a better future for the country.

As demonstration of the need for its current requests IP wrote the Voder study. At minimum this is flawed methodology. Is it possible that a study written by a utility with the motivation to increase its revenues would stress those things that bolster their contention and ignore those things which argue against it? A quick check reveals considerable cherry picking in IP's analysis. For example:

1. IP maintains it compiled the Voder study in collaboration with the public. Not me. No one I know was every consulted.
2. IP Voder is clear and understandable by the average customer. It seems pretty opaque in some critical areas.
3. Voder says there is no benefit for solar production during peak hours, but elsewhere assigns 20 cents per KH.
4. An alternate evaluation accounting for the broad societal benefits of solar generation was discounted by IP.

Everyone wants IP to be a robust and successful company; our state and national interest demands it. At the same time, we are in a time of significant national and global risk. Keeping our utilities strong is vital. This should not, however, be in conflict with the patriotic actions of private businesses and individuals who build out, on the home front, new electric capacity. My hope is that the IPUC will take a stance not only supportive of IP viability, but will actively welcome, supporting concrete protections for those who have gone solar, or who are considering doing so.

Scott Burlingame
Boise, ID"

The following comment was submitted via PUCWeb:

Name: Harry Reifschneider
Submission Time: May 22 2023 3:16PM
Email: reifer@mac.com
Telephone: 208-340-3402
Address: 3510 E Via Estancia Lne
Boise, ID 83716

Name of Utility Company: Idaho Power

Case ID: IPC-E-23-14

Comment: "I am writing to strongly object to Idaho Power's effort to change the rules on power generation from solar panels on my house.

I think it is unreasonable to make this change after the fact. I made a significant financial decision to put solar panels on my house. I took the decision very seriously since it involved a \$75,000 expenditure. My analysis was based on the way Idaho Power handled power generation at the time.

They have offered to grandfather plans that they call legacy that were in service 4 years ago. How am I not legacy? I've had solar panels for almost 3 years. Why would they choose an arbitrary date? I have no objection to them changing the rules for future projects. People can look at the program and make an intelligent decision. My decision has already made made. I spent the money, I can't change my mind.

I spent a lot of money mostly for the good of the climate. It's a stretch to think it makes economic sense but I did it believing that over time I would maybe come close to break even. Now they want to change the rules and make my decision even more questionable.

I urge the commission to deny this request or at least force Idaho Power to grandfather anyone who has already spent the money to get solar.

Thanks

Harry Reifschneider"
