

The following comment was submitted via PUCWeb:

Name: Daniel Bagley
Submission Time: May 25 2023 9:27AM
Email: dbagley3@gmail.com
Telephone: 208-919-6689
Address: 4703 W Kendall St
Boise, ID 83706

Name of Utility Company: Idaho Power

Case ID: IPC-E-23-14

Comment: "As far as I can tell, the decision to designate some solar power systems as "legacy" before 12/20/2019 is arbitrary. What is behind that cut-off date? Remember, if you allow Idaho Power to effectively disincentivize solar power generation for certain customers, that decision will need to stand up in a court of law in a class-action lawsuit that will inevitably be filed. It would seem that, for Idaho Power's purposes, legacy solar systems would be those installed after the onsite generation compensation structure is officially changed. "

The following comment was submitted via PUCWeb:

Name: Jacob Waffle
Submission Time: May 25 2023 10:49AM
Email: thejakewaffle@gmail.com
Telephone: 509-934-9052
Address: 16916 Carmichael Ave
Caldwell, ID 83607

Name of Utility Company: Idaho Power

Case ID: IPC-E-23-14

Comment: "I do not agree with the change in compensation for customers with their own solar generation solutions. The "equity" term used in a recent letter on the changes highlights the issue. Equity is not the same as equality. We want equality, not equity."

The following comment was submitted via PUCWeb:

Name: Jennefer Kopczynski
Submission Time: May 25 2023 11:51AM
Email: kopadams1231@gmail.com
Telephone: 208-983-1587

Address: 11322 W Portola St
Boise, ID 83709

Name of Utility Company: Idaho Power

Case ID: IPC-E-23-14

Comment: "Removing Netmetering is a bad idea for Idaho. We already lag behind in renewable energy consumption, and net metering allows for people to recoup their installation costs more quickly than waiting for the for-profit company to decide their going rate. This is a short sighted attempt to claw back funds - especially when the solar customers are still paying your monthly service fees. Don't lead the race to the bottom on sustainable solutions."

The following comment was submitted via PUCWeb:

Name: Russell Graves
Submission Time: May 25 2023 1:36PM
Email: rgraves@sevarg.net
Telephone: 515-460-0436
Address: 3791 Southside Blvd
Melba, ID 83641

Name of Utility Company: Idaho Power

Case ID: IPC-E-23-14

Comment: "I have a number of concerns about Idaho Power's (IP) recent proposal for changing the net metering system. One in particular argues that IP has not properly considered the incentives their proposed billing plan encourages, and the financial rewards provided for being "grid-hostile" during peak demand times.

First, I question the objectivity of the VODER study. IP claimed that nobody else could understand their power system and they had to do the study, which is self-serving nonsense - power systems are well understood and largely similar throughout the country. That they did not wish to share data with a neutral third party either implies that they don't have it in useful forms, or that they wished to interpret it in the most-optimistic-for-Idaho-Power sense. They ignore a range of environmental benefits of solar, claiming that as there is no direct monetary value on them, they're worth \$0 and should be ignored.

The Crossborder Energy response to the VODER study raises many places where the numbers used in the VODER study are excessively optimistic, or simply missing, and also raises a number of places where IP's math simply doesn't make sense - applying average line losses to peak marginal kW offset by distributed energy, or ignoring solar production consumed behind the meter when calculating the ELCC of the distributed solar resources. They come up with a far higher number than IP for the value per kWh exported, and while they have their own biases, the PUC should consider their analysis as well, and have their engineers attempt to determine where the truth lies.

The realtime monitoring has several concerns as well. First, it results in what amount to demand charges on residential customers - how your power consumption peaks over a period of time impacts your cost, even with equal power used on otherwise identical days. Power companies have historically been reluctant to put demand charges on residential customers, as it's hard to reason about for most customers, and most homes are not equipped to level demand, with power companies instead relying on aggregated demand to large residential areas being fairly smooth and predictable.

However, I'm most concerned about the fact that nobody at IP seems to have considered that the incentives with their preferred realtime metering encourage grid abuse during peak demand times - which seems at odds with the intended goals.

Consider a summer peak export rate of \$0.20/kWh and a consumed energy retail rate of \$0.10/kWh, and an hour with solar production of 10kWh (an even 10kW for the hour) and 5kWh of variable loads during the hour.

If the 5kWh of load is consumed evenly at 5kW, the export during that hour will be 5kWh, and the credit received for future use will be $5 * 0.20 = \$1$.

However, consider the result if a consumer "stacks loads" such that the 5kWh is consumed in the first 15 minutes of the hour, with the same 10kW of solar production.

If the customer consumes power at 20kW for the first 15 minutes against their 10kW solar production, they will net consume 10kW for 15 minutes - so 2.5kWh from the grid at a cost of \$0.25. The next 45 minutes, they will export at 10kW (totaling 7.5kWh) for a credit of \$1.50. The net credit for this hour, then, is \$1.25 - meaning that this situation of heavy demand followed by heavy export is encouraged over the smooth consumption and export of power.

This seems, to me, to be opposed to what would be preferred in a high demand situation, which is a continuous export of power during peak credit hours. Moving to hourly net metering would discourage this somewhat, though the same still holds with hour to hour import and export. Daily net metering would mostly discourage this sort of grid abuse.

That IP hasn't observed this sort of behavior yet is simply a result of the fact that there is no benefit to it under current net metering rules. I would fully expect homeowners with solar to optimize the credit to their benefit, and IP should not be moving to a net metering replacement that encourages this sort of use. Their proposed structure encourages grid-friendly energy exporting during off-peak times, and encourages grid-hostile energy exporting during peak demand.

I encourage the PUC to look at the entirety of the situation, and do their own evaluation on expected costs and benefits using current fuel rates and realistic numbers. If, as the CrossBorder study argues, the value of an exported kWh is more than the retail rate, then there is no need to remove the current kWh for kWh net metering system. However, if the PUC determines that the IP's values are closer to correct, I would encourage them to consider the various ways in which the realtime, hourly, or daily net metering incentivizes different customer behaviors. Realtime metering, as I show above, seems to encourage particularly bad behaviors

I recognize that IP wants to change things, but I encourage the PUC to make sure that the changes make grid-sense!"

The following comment was submitted via PUCWeb:

Name: Albert Nasby
Submission Time: May 25 2023 2:54PM
Email: Albertn2@yahoo.com
Telephone: 208-249-8316
Address: 902 Cornwall Way
Fruitland, ID 83619

Name of Utility Company: Idaho Power

Case ID: IPC-E-23-14

Comment: "I am against the proposal to raise utility prices and cut net metering on homes that have solar energy. The purpose of solar energy is to help reduce the load on power companies. Therefore, home owners with solar energy should not be punished by increased utility bills. "
