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IDAHO PUBLIC
UTILITIES COMMISSION

IPC-E-23-14

Proposed Methodology & Rates for Schedule 6 - Solar generators

David Chamberlain, Eagle, ID. 9-14-2023

SUMMARY

I would ask the commission to grant a 5 year stay on these changes or in other words grant us, those who installed between Jan 2020 - Now, 5 more years of the current system to help recoup some of the investment. Then implement the change. Otherwise please read on for what I believe are significant deficiencies and issues with the current Idaho Power proposal. HERE ARE THE ISSUES

1) PEAK HOURS discrepancy
2) Rate Impact Discrepancies
3) Given foundational "subsidization" claim - where is the offsetting rate reduction
4) Large customers contracts not available for comparison
5) Communication lacking
6) Solar providers - some still not honest

Issue #1 - "Peak Hours"

For some time now the alternative rate schedule called the Idaho Time of Day Plan has had the "Peak Time" from 1-9 pm. Seems like it should have been well thought out & IPUC approved it. Now that they are paying ~20¢ per hour for excess power generation, the proposal for "Peak Hours" is 3-11 pm. Conveniently cutting off my 2 most productive generating hours, but graciously adding those 2 hours back after the sun has gone down. I brought this up on 9/6/23. They acknowledged the problem and some confusion at Idaho Power and said it would be resolved. I attribute it to greed not an oversight.
Please make the "Peak Time" 1-9.

Issue #2 - Watered down RatePayer Impact Charts being fed to IPUC? Or just bad Idaho Power analysis.

Look at Exhibit 1, Idaho Power's Revenue Impact table, line 4 - Residential On Site Generation. It has the revenue before and after the change. It goes up 60.82%! Now look at Exhibit 2, Idaho Power's Average monthly bill impact. It shows fairly modest impacts to almost all groups of users. You CANNOT get to 60.82% growth from this chart. So are they showing you what you want to hear - that this isn't that big of a deal for anyone. I brought this ups on 9/6/2023. They "waived their arms" and said it was the result of 2 different analyses done at different times over the last few months and would be reconciled. What? In a matter of months they have 2 different answers? Given the hundreds of pages of the VODER study and IRP that they presented as accurate and irrefutable and then the IPUC accepted - you would think they are great at these analyses. They should be, but I frankly don't trust their numbers. Please have your staff look these over carefully. The motivation would seem to bias them toward presenting watered down impact analyses that you want to hear.

On Sept 6, 2023 I also made a phone call to the Idaho Power Customer Service / Billing group. They have a team of specialists dedicated to on site generation questions. I asked them to do an impact schedule for my specific account for 2022. She was very nice but then informed me it was impossible, since I did not have my solar generation equipment in place for the full year. I turned my system on the last few days of January 2022. Simply amazing! All that IT investment going on in Idaho Power and they can't do a partial year analysis? How many installations happened in 2022. Hundreds? Thousands? If they can't do the analysis for partial year accounts how do they know what the real/estimated impact is? How confident are you in the impact statements? If you want to save some money and lower rates - scrap the IT and analyses departments at Idaho Power. I'm guessing that's way more money than the $4-5 million in question here. I don't trust their numbers and you should be very careful.

Issue #3 - This was billed as a <u>subsidization</u> problem. Where is the offsetting rate reduction for the basic residential service group?

I quote the commission "We agree with the company that net metering customers do escape a portion of fixed costs and shift the cost burden to other customers in their class." The whole 6 year saga ending with the accepted VODER study is about subsidization of the on site generation group by the general residential group.

Given that, and given Idaho Power's crackerjack analytical capabilities, it should have been like falling off a log EASY to also propose the corresponding rate reduction for all these poor people who have been subsidizing us. Where is it? I brought this up on 9/6/2023. Again, handwaving from Idaho Power. You should demand to see it quickly and approve it. Don't let it get muddled in the general rate change proposals. If this was significant enough to hassle over for 6 years and cause a lot of pain for people who have invested a lot in solar power, and if it is truly a subsidization issue, then you should demand to see the specific offsetting rate reduction for the general residential group. Idaho Power "knows" the impact to the solar generation customers. The arithmetic to give the money back to the rest of the residential customers should take a half day to figure out or a full day if they take a long lunch!

If the IPUC or Idaho Power claims that it is immaterial for the larger residential group particularly when other rate change proposals are larger and looming, then I would argue that it was immaterial all along and that the subsidization argument was camouflage for the real intent - control and greed.

Issue #4 - Large Customer Contracts - solar power - rates sealed. Why? Hiding something that might be useful to me.

At the 9/6/2023 Q&A session I asked what the rates were for Micron, META and perhaps others who were also investing in solar generation. I understand their scale is huge and the needs are different. I can understand and take different, but fundamentally they are, like me, generating a lot of power when the sun is out and none when it's not. Yes, they have to have significant, reliable, uninterruptible power 24/7. So they must have an ECR rate for peak and non peak generation times. What I don't understand is if this is a public utility why the backroom deals that the public doesn't get to see. It should be public and explained where needed. On 9/6/2023 I was abruptly told that it was complex and not public information and that I was not entitled to it.

Issue #5 - Communication

Idaho power claims they have saturated the customers with communication. The letter I received from them about the Sept Q&A session and the pending methodology and rate change was helpful. It was the only way I knew of both the round and of the VODER study last year. I have both electronic billing and autopay on Idaho Power account. I can't think off a time in any years that I looked at an "insert" electronically. Didn't know they were there. I usually don't even open thermal since I was on level pay. Maybe I am

unique. Maybe not. It would interesting to do a quick survey and find out if their method of communication is adequate.

Issue #6 - Solar Providers - not all honest

My Solar Provider, EGT, was up front from the beginning about the potential change. They thought or at least hoped it wouldn't be signifiant but they did disclose the risk. That was late 2021. We installed in Jan 2022. I have a neighbor who installed panels this last spring - 2023. I spoke with him after I saw the installation - I was frankly surprised he did it given the pending changes. He was excited about the hour for hour deal that it was. He had no idea that the VODER study existed and was approved and that a methodology and rate change was coming soon. The story is his, not mine and I don't know the company name. It was not EGT, that I know. Just know that not everyone is playing above board.

Issue #7 - Transition Period Desired

I made a large investment, even after the large federal and small state rebates were obtained. This was yielding a 9-10 year payback guesstimate. I don't have a personal impact analysis, but given that I generate a lot of power during non-peak months and non peak hours, I think the impact will be significant. Last year I generated 12.3Mw hours and I carried over 2000 hours from the spring into the hot, A/C intense summer months - July & August. All of that will now be subject to the ECR rate approved. I suspect my payback period will now be in the 25-30 year range. It is a clear no brainer - don't do it.

I would ask for some kind of transition.

A) Grandfather more installation (2020-current) for say a period of 5 years. (You gave the legacy installations 25 years - way beyond any basic payback and quite a positive return on their investment and yet you stick it to anyone since then.)

B) Increase the ECR rates for a few years

C) Look at Daily netting instead of Realtime netting.

D) After say 5 years, appoint another committee to revaluate. This time include Idaho Power, solar providers, homeowners like me, environmental groups - in other words

representatives of all groups. Lock them in a room and tell them to confirm the status or propose changes. I think it can be done

Issue #8 - IPUC - IDAHO PUBLIC UTILITIES COMMISSION or IDAHO POWER UTILITIES COMMISSION?

I hope the commissioners really read the comments. I also really hope you are the IDAHO PUBLIC UTILITIES COMMISSION and haven't become the IDAHO POWER UTILITIES COMMISSION. Jury is still out.

EXHIBIT #1

Idaho Power Company
Calculation of Revenue Impact 2023
State of Idaho
IPC-E-23-14
Filed May 1, 2023

Summary of Revenue Impact
Current Base Revenue to Proposed Base Revenue

Line No	Tariff Description	Rate Sch. No.	(1) Current Energy (kWh)	(2) Current Base Revenue	(3) Mills Per kWh	(4) Proposed Energy (kWh)	(5) Total Adjustments to Base Revenue	(6) Proposed Base Revenue	(7) Mills Per kWh	(8) Percent Change Base to Base Revenue
	Uniform Tariff Rates:									
1	Residential Service	1	5,404,135,997	$499,860,983	92.50	5,404,135,997	$0	$499,860,983	92.50	0.00%
2	Master Metered Mobile Home Park	3	4,476,086	$390,879	87.33	4,476,086	$0	$390,879	87.33	0.00%
3	Residential Service Time-of-Day	5	16,947,350	$1,494,824	88.20	16,947,350	$0	$1,494,824	88.20	0.00%
4	Residential Service On-Site Generation	6	73,032,591	$7,192,923	98.49	122,912,496	$4,374,445	$11,567,368	94.11	60.82%
5	Small General Service	7	138,285,160	$16,113,854	116.53	138,285,160	$0	$16,113,854	116.53	0.00%
6	Small General Service On-Site Generation	8	196,415	$25,654	130.61	370,708	$18,059	$43,713	117.92	70.39%
7	Large General Service	9	3,922,829,583	$266,952,199	68.05	3,923,243,800	$21,924	$266,974,124	68.05	0.01%
8	Dusk to Dawn Lighting	15	5,267,423	$1,261,853	239.56	5,267,423	$0	$1,261,853	239.56	0.00%
9	Large Power Service	19	2,386,695,635	$125,836,758	52.72	2,386,695,635	$0	$125,836,758	52.72	0.00%
10	Agricultural Irrigation Service	24	1,862,661,825	$140,219,247	75.28	1,864,522,772	$108,502	$140,327,749	75.26	0.08%
11	Unmetered General Service	40	13,925,301	$1,144,288	82.17	13,925,301	$0	$1,144,288	82.17	0.00%
12	Street Lighting	41	23,760,014	$3,463,322	145.76	23,760,014	$0	$3,463,322	145.76	0.00%
13	Traffic Control Lighting	42	2,847,961	$165,609	58.15	2,847,961	$0	$165,609	58.15	0.00%
14	Total Uniform Tariffs		13,855,061,341	$1,064,122,393	76.80	13,907,390,703	$4,522,930	$1,068,645,322	76.84	0.43%
15	Total Special Contracts		1,102,113,577	$47,661,314	43.25	1,102,113,577	$0	$47,661,314	43.25	0.00%
16	**Total Idaho Retail Sales**		**14,957,174,918**	**$1,111,783,707**	**74.33**	**15,009,504,280**	**$4,522,930**	**$1,116,306,636**	**74.37**	**0.41%**

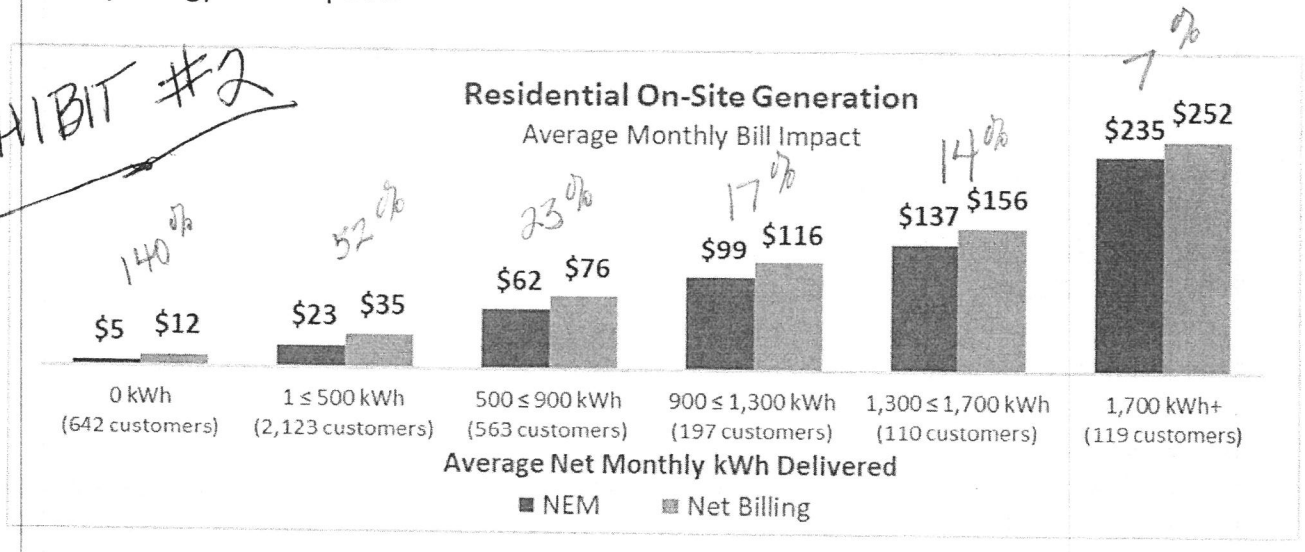
Solar power and other renewable energy sources are an important part of Idaho Power's energy mix, and the company supports customers who choose to participate in their own on-site generation. The company's goal with this request is to modernize the 20-year-old compensation structure for on-site generation to ensure prices for excess energy are fair and equitable for all customers.

How might my bill be affected?

For residential customers with non-legacy systems, Idaho Power evaluated 2022 data to assess how customer bills may be affected by the proposed change in compensation structure. The 2022 average monthly bill for residential customers under the current net monthly compensation structure was $40. Under the proposed real-time net billing, the average bill increases to $52, resulting in an average increase of approximately $12 per month or 30%.

The chart below shows the change in average monthly bills moving from the existing net monthly to real-time net billing compensation structure. The chart is organized by customers' average net monthly energy consumption.

EXHIBIT #2



What is the difference between net energy metering and real-time net billing?

Under monthly net energy metering (NEM), customer-generators receive a credit in kWh for any monthly excess energy generated. The credit can be applied to offset energy within the current billing cycle and carry-forward credits can be used to offset energy consumption in future periods.

Real-time net billing measures and charges customers for all kWh consumed from the grid at the retail rate, and measures and compensates customers for all kWh exported to the grid at a time differentiated export credit rate (ECR).

What is a "non-legacy" system?

As part of previous cases, the IPUC granted legacy status — sometimes referred to as "grandfathered" — to eligible Idaho residential and small general service on-site generation systems as of December 20, 2019, and to eligible commercial, industrial and irrigation and Oregon residential and small general service systems as of December 1, 2020. In these previous cases, the