

-----Original Message-----

From: Jay Basen <jay.m.basen@gmail.com>

Sent: Thursday, October 19, 2023 8:14 PM

To: Jan Noriyuki

Subject: IPC-E-23-14

Hi,

my name is Jay Basen and I'm an Idaho Power customer. I'm concerned about the very limited public access to the upcoming hearings on Idaho Power's rooftop solar changes. The hearings need to be after general working hours, be long enough to allow everyone to speak, be located in at least two more cities, and include a virtual testimony option for all the people who can't attend in-person. Please help people participate in our democracy, particularly on proposals coming from a monopoly utility.

Thanks

Jay

The following comment was submitted via PUCWeb:

Name: STEPHEN HILLIER

Submission Time: Oct 20 2023 12:15PM

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Name of Utility Company: Idaho Power

Case ID: IPC-E-23-14

Comment: "Having reviewed Idaho Power's request to change to real time net metering, I found their definition of what they claim to be 'Peak Hours' to be extremely limited; given the data set they provided - it seems that a lot more time should be considered peak hours. Backing up this observation - Idaho Power's own Time of Day Plan has a much broader definition for what is considered 'Peak Hours' for customers in Idaho.

What I find most interesting is that their 'Peak Hours' defined here match their Time of Day Plan hours for Oregon customers. They have a separate Time of Day Plan for Idaho customers, as I mentioned previously. The Idaho plan changes peak hours from 3:00 PM - 11:00 PM down to 1:00 PM - 9:00 PM. It also opens up the entire year to peak hours (which seems appropriate based on their provided power demands in their document writeup).

By their own admission based on their Time of Day Plan for Idaho customers, power is more valuable from 7:00 AM - 9:00 PM on non-summer months. This time should be included as another 'Peak Hour'

window. Admittedly, it is billed at a lower rate than the summer Peak Hours - which their proposed reimbursement changes could have easily accounted for - but don't.

Around 20% of the power my system produces in the summer is between the hours of 1:00 and 3:00 PM. Idaho Power claims that the power my system generates during that time period isn't worth anything to them in their writeup. However, on the other hand they claim that power usage during that time period is in high demand based on their Time of Day Plan pricing.

In summary - I feel strongly that Idaho Power, if they are permitted to switch over to Real Time Net Metering, should be constrained on how they are defining 'Peak Hours' to match the 'Peak Hours' that they themselves use in their Time of Day Plan pricing.

If they aren't - I would be interested to see how their Time of Day Plan participants will interpret Idaho Power's double standard when it comes to the value of electricity. Based on their own writeup - wanting customers to pay their fair share - this proposal seems like it is accomplishing quite the opposite of that; and makes me question their other current billing practices.

Finally, I noticed that there doesn't seem to be any defined controls or processes in place for how they determine how much to reimburse customers for on-site power generation with regards to future budgetary years. With how this proposal is written - I would expect Idaho Power to continue to reduce the reimbursement rate; as they seem to view solar customers as an entitlement. Their claim that solar isn't valuable to them because most of the power it produces it produces outside of times of high demand is ridiculous - seeing that most of the power they generate is from hydro electric sources. How will that work for them in years of drought - is it still reliable? We've received a lot of moisture in the last few years, but that wont continue.

I feel that their proposed changes are short sighted. They should be looking into better ways to capture and store renewable energy instead of looking for ways to prevent its buildout. By their own admission - these changes could very well make it so that customers stop building solar systems entirely - as the incentive to do so is being removed.

Thank you for considering my thoughts on this subject.

Sincerely,
Stephen
(An Idaho Power customer in Idaho with on-site solar)"
