



November 8, 2023

Dear Idaho Public Utilities Commission,

This letter is concerning Idaho Power's (IPC) export credit rate proposal, case number IPC-E-23-14. I am writing on behalf of the Portneuf Resource Council (PRC).

The Portneuf Resource Council is a non-profit organization that promotes clean energy and clean water in Southeast Idaho. PRC is a local chapter of the Western Organization of Resource Councils. WORC has more than 18,000 members and 37 chapters across 7 western Rocky Mountain States. PRC has about 50 members and has more than 300 clean energy supporters in Southeast Idaho who follow PRC's clean energy campaigns. In 2019, PRC organized the Solarize Pocatello campaign which resulted in more than 80 residential solar installations in our region.

PRC acknowledges and applauds Idaho Power's commitment to 100% renewable energy by 2045. Further we commend Idaho Power's plan to offer clean energy options to customers who may not have the means or ability to add onsite clean energy generation and in general, we support the concept of Idaho Power's Clean Energy Your Way program.

Idahoans who want to install solar deserve to receive a fair and equitable rate for the excess energy exported to the grid and similarly, Idaho Power should receive a fair and equitable amount for that power.

The current proposal from Idaho Power has several issues. There are a couple key points PRC wants to highlight to the Commission.

The first of which is the timing. There is a concurrent Idaho Power proposal before the PUC for a general rate increase. That general rate increase includes a plan to increase the fixed charge fee for all Idaho Power customers including existing and future residential solar customers. The initial proposal to increase the fixed charge fee is something like a 700% increase over just a few years. I understand it has been re-negotiated down 300 or 400%, but it is not yet approved, and it has not been demonstrated by Idaho Power what impact this still significant increase in the fixed charge fee will have on the complex calculation of the export credit rate. Idaho Power has stated that the changes in the export credit rate are, in part, to ensure that solar owners pay their fair share of grid maintenance and improvement costs. At the same time, the General Rate Change proposal says the increase in the fixed charge fee is to recover fixed costs that all customers incur, which includes grid maintenance and improvements. It appears that the two proposals could shift an unfair burden of fixed costs to solar owners. The general rate increase proposal should be resolved and the impact on fixed charges be quantified, only then should the proposal for the Export Credit Rate be re-evaluated and submitted to the PUC.

The second point is related to re-evaluating the export credit rate without forecasting future changes. The initial export credit rate values in the proposal are given only for the first year and the proposal calls for a periodic re-evaluation of the export credit rate. This open-ended portion of the proposal has the chilling effect of creating huge uncertainty for anyone considering installing a residential system. Return on investment can not be calculated. Idaho Power has a powerful model that they use to create their Integrated Resource Plan. PRC suggests that Idaho Power uses this capability to model and forecast a range of values for future Export Credit Rate changes. Having a range of potential values for the export credit rate will give people the means to calculate a best and worst case return on investment. This is a reasonable request that could be amended into the Idaho Power proposal.

PRC encourages the PUC Commissioners to consider the sequence of both Idaho Power proposals. We propose that the general rate case increase needs to be resolved before moving forward with the export credit case. Further, when evaluating the future proposal for the export credit rate, in fairness to solar customers, Idaho Power should model the range of potential Export Credit rate values out in time - 5, 10, 15, and 20 years similarly to how they model their entire business in their ongoing Integrated Resource Plan evaluations.

Lastly, PRC believes it is important to include the economically quantifiable environmental benefits of clean energy in any Idaho Power proposal affecting clean energy generation. Idaho Power acknowledges the impacts of climate change in its Integrated Resource Plan and commits to clean energy as part of the solution to mitigate climate impacts in Idaho. This is a good reason to make sure these benefits are included here and in any future Idaho Power proposals to the Idaho Public Utilities Commission.

Thank you for the opportunity to provide written comments and we look forward to your decisions.

Sincerely,

Mike Engle
Chair, Portneuf Resource Council
208 284 3825
www.portneufresourcecouncil.org

Public Comments to Idaho Public Utilities Commission

Case # IPC-E-23-14

10/21/2023

Name: RICHARD STONE

Email: oms@centurylink.net

Address: 10000 W LOS RANCHITOS DR, Boise, ID 83709

Hi, my name is Richard Stone 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

I'm very concerned about Idaho Power's proposal to slash rooftop solar compensation rates year after year, pushing rooftop solar further out of reach for Idahoans. Rooftop solar provides so many benefits to Idaho Power and all its customers, yet Idaho Power's calculations don't capture that full value. It's not accurate, it's not fair, and it's not right.

A) Please resolve Idaho Power's General Rate Case first, to allow for a more accurate assessment and understanding of this case for rooftop solar customers and regulators alike.

B) Please look to Vote Solar's expert recommendations to correct Idaho Power's calculations (on Generation Capacity, Line Losses, Transmission & Distribution Deferral, Fuel Price Hedge, & Environmental Compliance) and provide customers with an initial Export Credit Rate of at least 10 ¢/kWh.

C) Please also adopt Vote Solar's recommendation for customers to lock-in their initial rate for at least a 10-year period (as is done in NV and AZ) for financial stability and planning.

Lastly, please improve the public process by adding a virtual testimony option (as is provided at Public Service Commissions in all neighboring states) to help ensure you can hear the important perspectives from everyone who will be impacted by Idaho Power's changes.

Thank you.

10/23/2023

Name: Cynthia Marrs
Email: marrs_cynthia@yahoo.com
Address: 94224 Templeton Rd, Junction City, OR 97448

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Thank you.

10/23/2023
Name: Gordon Sorensen
Email: gordons@fastmail.com
Address: 14001 E Blacks Creek Rd, Boise, ID 83716

The PUC should do what they did back in December 2019 and reject Idaho Power's latest proposal to reduce and or eliminate compensation for excess power generated by current and future net metered customers. Idaho Power has not put forth any factual data to support the idea that net metered customers are not paying their fair share. Idaho Power simply seeks to convert net metered customers into a revenue source.

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Thank you.

10/23/2023

Name: Laura Mathews

Email: lauralukasmathews@gmail.com

Address: 505 riverview, Boise, ID 83712

Renewable energy needs to be tackled on many fronts and restricting any progress is counterproductive. Please don't support a monopoly or let one company dictate our future

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Thank you.

10/24/2023

Name: Jeannie Belton-rumple

Email: mijean95@gmail.com

Address: 620 S MAJESTIC VIEW DR, POST FALLS, ID 83854

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10/24/2023

Name: Anna Cowen

Email: annaysun@yahoo.com

Address: 19308 Leland Rd, Oregon City, OR 97045

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10/24/2023

Name: Heather Steele

Email: hnsteele3@gmail.com

Address: 520 E Jefferson Street, BOISE, ID 83712

Hi, my name is Heather I'm a rooftop solar generator and Idaho Power customer. I object to the limited public access to tomorrow's hearing on Idaho Power's rooftop solar changes. The hearing should have been set after general working hours, long enough to allow everyone to speak, located in more cities to allow wider access across Idaho Power's service area, and BY ALL MEANS include a virtual testimony option for all the people who can't attend in-person. Please reconsider the restrictive scheduling of this meeting. Thank you.

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10/24/2023

Name: Joleen Evans

Email: jaevans97@gmail.com

Address: 122 W Colby Ln, Boise, ID 83706

I stand for protecting the future of renewable energy and decreasing our reliance on fossil fuels. People should have the personal power and choice of how they power their households. And with a big financial decision like this, people deserve to know their rates will stay stable so they can properly forecast the true investment of solar energy. And Idaho Power needs to be honest about this rate. It is greedy and selfish to low ball what the rate is just so people continue to use Idaho Power. We want companies out of our personal finances and want the option and freedom to power our households independently.

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10/24/2023

Name: Alayna Whipple

Email: alaynawhipple@gmail.com

Address: 1216 s arcadia st, Boise, ID 83705

In a world where electricity is imbedded into almost all aspects of life, we must have a sustainable way to produce electricity to power our modern lives. Rather than solar farms that damage the ecosystem by destroying sagegrouse habitats, the ability to install solar panels on roofs eliminates the potential for further damage to ecosystems around us. I believe we should take advantage of the structures that already exist to capture some of the sun's limitless energy. Without the ability to have solar panels on our homes, the idea of an electric vehicle is no cleaner than gas engines.

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10/24/2023

Name: Steve Folkner

Email: steve.folkner@gmail.com

Address: 9860 W Westview Dr., Boise, ID 83704

I think it is important to encourage regular folks to participate directly in conserving energy and choosing to participate in using clean power sources. I think that can be fairly done by providing some financial incentives to Idaho Power to encourage rooftop solar installation and reducing

the upfront cost of installing rooftop solar. Idaho Power should be saving some money since rooftop space is free (rather than paying for land) and the cost of solar installation is going down. I think people behave better when they are engaged.

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10/25/2023

Name: Anne Egbert

Email: bigdoganne@gmail.com

Address: 7211 W McMullen St, Boise, ID 83709

I have roof top solar on my own home and am a big supporter of expanding the use of power that is not powered by fossil fuels.

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10/25/2023

Name: Debra Saude

Email: deanndeb@centurytel.net

Address: 1910 NE 21st St, Lincoln City, OR 97367

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Email: deanndeb@centurytel.net

Address: 1910 NE 21st St, Lincoln City, OR 97367

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10/25/2023

Name: Dexter Pitman

Email: dvpitman2@outlook.com

Address: 13689 N MARBLE DR, Pocatello, ID 83202

I am a conscientious power consumer and have been for my entire history with Idaho Power, since 1986. I went further by up-fronting \$10,000 of my personal finances to add my and additional electricity production into the IPCO grid. My monetary reward is less than IDA stock investment and my efforts only met with resistance by IPCO as approved by the "Public Utilities Commission. The proposed roof top solar rate case (IPC-E-23-11) will increase the fixed monthly fee of \$5.14 to \$35 which will be considerably more than my IPC power charges one year before going to roof top solar! While Rocky Mountain Power is providing creative ways to include roof top solar in their Utah clean energy future power package, IPCO with the consent of the IPUC continues to discourage roof top solar in Idaho. I am against the rate case request of IPC and believe the IPUC and the Idaho Office of Energy and Mineral Resources need to decide what Idaho's Clean Energy Policy is regarding Roof Top Solar.

I'm very concerned about Idaho Power's proposal to slash rooftop solar compensation rates year after year, pushing rooftop solar further out of reach for Idahoans. Rooftop solar provides

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10/25/2023

Name: Linda Engle

Email: lindarsengle@gmail.com

Address: 340 S 11th, POCATELLO, ID 83201

I am concerned about climate change, and the more solar we have the better for the planet. Also residential solar in micro grids and/or with batteries is more resilient in extreme weather. The PUC should be promoting all renewables not slowing their deployment. Pay attention to the scientists: climate change is real and we are moving too slowly to keep our planet from heating up. I have children, do you? The PUC needs to be part of the solution.

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10/25/2023

Name: Shiva Rajbhandari

Email: shiva.a.rajbhandari@gmail.com

Address: 721 Hearthstone Dr, Boise, ID 83702

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10/29/2023

Name: Gene Reynolds

Email: greynold2010@gmail.com

Address: 7838 Tranquility In, Meridian, ID 83642

I installed solar to make less demands on Idaho Power demand, provide more power to communities whose only option for power is more harmful to the planet and, of course, save money. I have invested a nsignificant amount of money in this idea and any move by Idaho Power negate that noble idea a shameful act.

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Thank you.

10/29/2023

Name: Kevin Ward

Email: wardpa1950@gmail.com

Address: 12805 W. Reservation Rd., Pocatello, ID 83202

As an Idaho Power customer, I urge the Idaho PUC to ensure Idaho Power applies Vote Solar's recommended compensation rates for rooftop solar owners..

I'm very concerned about Idaho Power's proposal to slash rooftop solar compensation rates year after year, pushing rooftop solar further out of reach for Idahoans. Rooftop solar provides so many benefits to Idaho Power and all its customers, yet Idaho Power's calculations don't capture that full value. It's not accurate, it's not fair, and it's not right.

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Thank you.

10/30/2023

Name: Mark Roberts

Email: markroberts@isu.edu

Address: 536 South 9th Av, Pocatello, ID 83201

Supporting Roof-top Solar in Idaho is important to the state and the nation. All efforts to avoid greater pollution of our air by use of carbon-based fuels should be maintained. I was previously informed that since my solar generation system was a "Legacy" system, I would not be subject to any rate changes until 2045. I expect the Idaho PUC to honor that commitment. I'm very concerned about Idaho Power's proposal to slash rooftop solar compensation rates year after year, pushing rooftop solar further out of reach for Idahoans. Rooftop solar provides so many benefits to Idaho Power and all its customers, yet Idaho Power's calculations don't capture that full value. It's not accurate, it's not fair, and it's not right.

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Lastly, please improve the public process by adding a virtual testimony option (as is provided at Public Service Commissions in all neighboring states) to help ensure you can hear the important perspectives from everyone who will be impacted by Idaho Power's changes.

Thank you.

10/30/2023

Name: Laurie Engelhardt

Email: engelhardt.lauriek@gmail.com

Address: 777 Filmore Ave, pocatello, ID 83201

I have solar and know that if Idaho Power instead helped with batteries for folks with Solar they would make a much more successful decision. This seems like more of the "climate deniers" work - and it is distressing to know that IDaho Power appears to have been bought by the extremist right wing No interest in people - just their own wealthy

I'm very concerned about Idaho Power's proposal to slash rooftop solar compensation rates year after year, pushing rooftop solar further out of reach for Idahoans. Rooftop solar provides so many benefits to Idaho Power and all its customers, yet Idaho Power's calculations don't capture that full value. It's not accurate, it's not fair, and it's not right.

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Thank you.

10/31/2023

Name: Sergio Hickey

Email: sergio.hickey@gmail.com

Address: 3590 Ridgewood Rd, Pocatello, ID 83201

Idaho is based on principles of not only fairness, it independence from tyranny. We are a hardy people. I'm sure you'll get plenty of arguments pertaining to fairness, so I will focus on the one pertaining to tyranny. One requirement of Independence from tyranny. Like our founding fathers before us, we have recognized key elements important in the fight against tyranny. In 1776, one such requirement was the 2nd amendment, which serves as a deterrent. However a new requirement unique to the modern world is the ability to produce one's own power. With your

own power production you can: produce food during winter, heat your home, cool your home, fuel your electric vehicles, and power a water condensation device in order to supply your family with portably water. Without solar, a tyrannical ploy against our people would render us without power by simple disabling of a single centralized energy conduit. I dream that Idahoans can someday be totally energy independent.

I'm very concerned about Idaho Power's proposal to slash rooftop solar compensation rates year after year, pushing rooftop solar further out of reach for Idahoans. Rooftop solar provides so many benefits to Idaho Power and all its customers, yet Idaho Power's calculations don't capture that full value. It's not accurate, it's not fair, and it's not right.

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Thank you.

10/31/2023

Name: Beverly Mitchell

Email: bevrosam@aol.com

Address: 1812 S Watersilk Pl, Boise, ID 83709

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Thank you.

10/31/2023

Name: Cathleen Weston

Email: westcat78@gmail.com

Address: 16660 N Right Fork Rd, Hauser, ID 83854

WHY NOT

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Thank you.

10/31/2023

Name: James Van Dinter

Email: jvandinter@mac.com

Address: 12088 W Tidewater Dr, Boise, ID 83713

I'm very concerned about Idaho Power's proposal to slash rooftop solar compensation rates year after year, pushing rooftop solar further out of reach for Idahoans. Rooftop solar provides so many benefits to Idaho Power and all its customers, yet Idaho Power's calculations don't capture that full value. It's not accurate, it's not fair, and it's not right.

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Thank you.

11/1/2023

Name: Ann Swanson

Email: ann.swanson@gmail.com

Address: 2161 Diane Lane, Pocatello, ID 83201

Hello, I am a solar panel home owner. I feel Idaho Power is trying to shortchange solar owners who made an investment in power generation and environmental stewardship. The PUC should support policies that encourage alternative energy. Idaho Power's proposed rate is too low and should be at least 10 cents per KW hour. New customers should be able to lock in their rate for at least 10 years, so they can recoup their solar investment. Thanks Ann

I'm very concerned about Idaho Power's proposal to slash rooftop solar compensation rates year after year, pushing rooftop solar further out of reach for Idahoans. Rooftop solar provides so many benefits to Idaho Power and all its customers, yet Idaho Power's calculations don't capture that full value. It's not accurate, it's not fair, and it's not right.

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Thank you.

11/1/2023

Name: William Patterson

Email: blackrockcp@gmail.com

Address: 5056 West Old Hwy. 91, Inkom, ID 83245

As you add rooftop solar to your mix of energy sources, you avoid adding sources that are more expensive like coal, nuclear and natural gas. Also you didn't have to pay to build the the infrastructure to provide that power. You get rooftop solar power for an extremely low cost when you factor in your savings from not having to add expensive power sources and the savings from not having to pay for installing that power. You should be rewarding your rooftop solar providers instead of trying to kill the program. Please don't be swayed by anti-environmental political interests. Those BIG money interests are not interested in helping your residential customers. They are only interested in big profits from polluting energy companies. Don't let the politics of greed dictate how you treat your residential customers.

I'm very concerned about Idaho Power's proposal to slash rooftop solar compensation rates year after year, pushing rooftop solar further out of reach for Idahoans. Rooftop solar provides so many benefits to Idaho Power and all its customers, yet Idaho Power's calculations don't capture that full value. It's not accurate, it's not fair, and it's not right.

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Thank you.

11/2/2023

Name: Donna Lybecker

Email: donnalybecker@gmail.com

Address: 446 S 9th Ave, Pocatello, ID 83201

Solar is a way to make energy affordable. Unless ID Power takes freedom from the people of Idaho.

I'm very concerned about Idaho Power's proposal to slash rooftop solar compensation rates year after year, pushing rooftop solar further out of reach for Idahoans. Rooftop solar provides so many benefits to Idaho Power and all its customers, yet Idaho Power's calculations don't capture that full value. It's not accurate, it's not fair, and it's not right.

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Thank you.

11/2/2023

Name: Emma Dickman

Email: emmayoung007@gmail.com

Address: 2894 W. Neff St., Boise, ID 83703

We gave solar panels & it seems like a penalty to have them based on the new credit reduction. I also feel like the impact these new rates will have on low income households will be substantial. And no incentive to go towards clean energy.

I'm very concerned about Idaho Power's proposal to slash rooftop solar compensation rates year after year, pushing rooftop solar further out of reach for Idahoans. Rooftop solar provides so many benefits to Idaho Power and all its customers, yet Idaho Power's calculations don't capture that full value. It's not accurate, it's not fair, and it's not right.

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Thank you.

11/2/2023

Name: Betty Young

Email: bettyyoung1631@gmail.com

Address: 4872 N Hacienda Ave, Boise, ID 83703

Boise has been my home for over forty years. Raised my 5 children here and all 5 graduated from Boise High School. I received my undergraduate and Masters Degree from BSU. My community is so far behind helping out those that will still be here when I'm gone. I taught Kindergarten for 18 years here in Boise and I recall the lessons I shared about Clean Energy. (A very foreign subject at that time) We were enthused! I would get sooo excited to share this would be THEIR future. I would tell them how they will help create a cleaner environment. Solar panels on our homes and schools are our responsibility. We owe this to our kids. IDAHO POWER we are sincerely asking you to reconsider how you're looking at this policy. I URGE THE PUC TO SAY NO to Idaho Power's Proposal.

I'm very concerned about Idaho Power's proposal to slash rooftop solar compensation rates year after year, pushing rooftop solar further out of reach for Idahoans. Rooftop solar provides so many benefits to Idaho Power and all its customers, yet Idaho Power's calculations don't capture that full value. It's not accurate, it's not fair, and it's not right.

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Thank you.

11/2/2023

Name: Michael Gaudette

Email: mikegaudette1636@gmail.com

Address: 1636S Country Terrace Way, Meridian, ID 83642

I took it upon myself to install rooftop solar panels for financial matters as well as to do a small part in protecting the environment. Now Idaho Power wishes to take advantage of my actions for its benefit. Idaho Public Utilities Commission should kill Idaho Power's unfair and unjust proposal.

I'm very concerned about Idaho Power's proposal to slash rooftop solar compensation rates year after year, pushing rooftop solar further out of reach for Idahoans. Rooftop solar provides so many benefits to Idaho Power and all its customers, yet Idaho Power's calculations don't capture that full value. It's not accurate, it's not fair, and it's not right.

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Thank you.

11/3/2023

Name: Daniel Dickman

Email: dannydickman@gmail.com

Address: 2894 W Neff St, Boise, ID 83703

As a solar owner in Boise, it is only fair that I am compensated properly for the excess power I provide to my dear community in the grid. As Idahoans we should strive to achieve energy independence, both on a statewide and individual level. Penalizing solar owners makes no sense and only benefits Idaho power, not the taxpayers and energy producers of Idaho. I'm very concerned about Idaho Power's proposal to slash rooftop solar compensation rates year after year, pushing rooftop solar further out of reach for Idahoans. Rooftop solar provides so many benefits to Idaho Power and all its customers, yet Idaho Power's calculations don't capture that full value. It's not accurate, it's not fair, and it's not right.

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Thank you.

11/3/2023

Name: Keith Talbert

Email: keitht2@msn.com

Address: 2410 S 10th Ave, Caldwell, ID 83605

The proposed Export Credit Rate is a reduction of 1/3. On top of this the proposed fixed fee, which Idaho Power told me was an administrative fee when I first looked in to adding solar to my house, is tripling. While I recognize that wages have increased in the last few years, I don't know anyone whose wages have come close to tripling, so I certainly don't understand why that is justified. By the same token, the adjustments that you have allowed Idaho Power to make to rates over the last several years have never come anywhere near a third, so I don't feel the Export Rate reduction is fair either. While this definitely affects me personally, I'm just as frustrated that these changes will greatly discourage others from switching to clean energy, and the benefits it has on both our environment and communities.

I'm very concerned about Idaho Power's proposal to slash rooftop solar compensation rates year after year, pushing rooftop solar further out of reach for Idahoans. Rooftop solar provides so many benefits to Idaho Power and all its customers, yet Idaho Power's calculations don't capture that full value. It's not accurate, it's not fair, and it's not right.

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Thank you.

11/3/2023

Name: Robert Streeter

Email: rhstreeter777@gmail.com

Address: 8263 e water stone ct, Nampa, ID 83687

Idaho Power says they support Solar but are actually working against it. They do not build any solar on their own but let out of state investors do that. They won't add anymore natural gas base load either

I'm very concerned about Idaho Power's proposal to slash rooftop solar compensation rates year after year, pushing rooftop solar further out of reach for Idahoans. Rooftop solar provides so many benefits to Idaho Power and all its customers, yet Idaho Power's calculations don't capture that full value. It's not accurate, it's not fair, and it's not right.

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Thank you.

11/3/2023

Name: Kerie Raymond

Email: kerie.raymondnd@gmail.com

Address: 20060 Rock Bluff Cir, Bend, OR 97702

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Thank you.

11/4/2023

Name: Jessica Lile

Email: jesil1327@gmail.com

Address: 499 avenue h, Boise, ID 83712

Residents deserve the ability to choose their energy sources and not have big government take those decisions away! Protect our rights and our beautiful state!

I'm very concerned about Idaho Power's proposal to slash rooftop solar compensation rates year after year, pushing rooftop solar further out of reach for Idahoans. Rooftop solar provides so many benefits to Idaho Power and all its customers, yet Idaho Power's calculations don't capture that full value. It's not accurate, it's not fair, and it's not right.

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Thank you.

11/4/2023

Name: Crystal Rain

Email: crystal.m.rain@gmail.com

Address: 3815 Kay Street, Garden City, ID 83714

I'm very concerned about Idaho Power's proposal to slash rooftop solar compensation rates year after year, pushing rooftop solar further out of reach for Idahoans. Rooftop solar provides so many benefits to Idaho Power and all its customers, yet Idaho Power's calculations don't capture that full value. It's not accurate, it's not fair, and it's not right.

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Thank you.

11/4/2023

Name: Kate Bauer

Email: kjbauer93@gmail.com

Address: 3012 W WOODLAWN AVE, BOISE, ID 83702

I'm very concerned about Idaho Power's proposal to slash rooftop solar compensation rates year after year, pushing rooftop solar further out of reach for Idahoans. Rooftop solar provides so many benefits to Idaho Power and all its customers, yet Idaho Power's calculations don't capture that full value. It's not accurate, it's not fair, and it's not right.

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Thank you.

11/4/2023

Name: Nicolas Lefevre

Email: niclef@yahoo.com

Address: 2755 Via Valdarno, Pocatello, ID 83201

In 2017, I made the decision to install rooftop solar on my home. This decision was based on many parameters but one of the main ones was the assurance that I could rely on net metering for the life of the system. It is essential to the financial soundness of any solar installation decision. As a whole, it also makes much more financial and economical sense for Idaho Power to assume the role of long term virtual "battery" for each of its rooftop solar customers versus each one having to purchase and install its own home battery system. The size of the utility allows this to be possible and make sense. In many ways, residential solar helps the utility by lowering traffic on the power infrastructure since it moved some generation closer to the distribution points. Idaho Power should embrace this partnership with individual residential power generation instead of treating it like competition and try to kill it. Thank you.

I'm very concerned about Idaho Power's proposal to slash rooftop solar compensation rates year after year, pushing rooftop solar further out of reach for Idahoans. Rooftop solar provides so many benefits to Idaho Power and all its customers, yet Idaho Power's calculations don't capture that full value. It's not accurate, it's not fair, and it's not right.

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Thank you.

11/4/2023

Name: Chelsea Smith

Email: che.smi@gmail.com

Address: 13 S Jackson, Boise, ID 83705

Solar is a technology of the future and just because every Idahoan can't take advantage of it just yet, does not mean we should be making it harder to attain. Please keep affordable access to solar available for Idahoans. There are so few things we can agree on politically in this state but my hope is that clean energy can truly become a bipartisan value. I implore Idaho Power to take the high road and become a leader in this space so Idaho can be a leader in some way, instead of always being the state that takes a step back into the dark ages. If Idaho Power helped citizens attain their own energy independence through solar they could be the hero of this story instead of playing the role of another greedy villain. Please help Idaho move forward not backward! Please resolve the General rate case to allow for better assessment and adopt Vote Solars recommendations.

I'm very concerned about Idaho Power's proposal to slash rooftop solar compensation rates year after year, pushing rooftop solar further out of reach for Idahoans. Rooftop solar provides so many benefits to Idaho Power and all its customers, yet Idaho Power's calculations don't capture that full value. It's not accurate, it's not fair, and it's not right.

A) Please resolve Idaho Power's General Rate Case first, to allow for a more accurate assessment and understanding of this case for rooftop solar customers and regulators alike.

B) Please look to Vote Solar's expert recommendations to correct Idaho Power's calculations (on Generation Capacity, Line Losses, Transmission & Distribution Deferral, Fuel Price Hedge, & Environmental Compliance) and provide customers with an initial Export Credit Rate of at least 10 ¢/kWh.

C) Please also adopt Vote Solar's recommendation for customers to lock-in their initial rate for at least a 10-year period (as is done in NV and AZ) for financial stability and planning.

Lastly, please improve the public process by adding a virtual testimony option (as is provided at Public Service Commissions in all neighboring states) to help ensure you can hear the important perspectives from everyone who will be impacted by Idaho Power's changes.

Thank you.

The following comments were submitted via PUCWeb:

Name: DONALD SHAFF
Submission Time: Nov 8 2023 4:43PM
Email: dvshaff6@gmail.com
Telephone: 208-890-5337
Address: 4552 N FOOTHILL DR
BOISE, ID 83703

Name of Utility Company: Idaho Power Co.

Case ID: IPC-E-23-14

Comment: "From 2 on the Application on Aggregation of meters for the annual transfer of unused Excess Net Energy credits:

The requirement to apply only to adjacent property and same system inhibits me from Idaho Power Company (IPCo) from helping IPCo from reducing my co-generation credits. Each year to year my Legacy credits have an increasing balance. However, on the same Account is a second residence meter near Crouch. Under IPCo plan I cannot transfer my primary home credits my other meter. The Commissioner's should in the Order in this case to expand where the Credits can be used.

Schedule 6:

Time Periods in Application:

Summer	Non-summer
Export Credit Rate, per kWh	
On-Peak 20.4221¢	n/a
Off-Peak 4.9100¢	4.9100¢

The Summer On-Peak rate appears generous, but is a pittance of the value to IPCo and it's publicly traded, shareholder held IdaCorp who wheels that excess power to markets on the inter-tie for much more where customers in markets served by power companies are accustomed to paying much higher rates during peak periods. IdaCorp embraces the IPCo proposal to increase shareholder dividends and value.

Time Periods proposed:

Summer Season

On-Peak: 3:00 p.m. to 11:00 p.m. Monday through Saturday, except holidays

Off-Peak: 11:00 p.m. to 3:00 p.m. Monday through Saturday and all hours on Sunday and holidays IPCo hardly recognizes when co-generation begins and timing of use in residents and businesses (in the broadest sense). In Summer co-generation is going strong at 11:00 since sunrise starts at around 6:30 a.m. when panels start exporting KwHs. In homes, a majority of working households are out the door and demand is reduced. IPCo On-Peak should start at least as early as 9:00 a.m. Off-Peak should correspondingly end at 9:00 a.m.

On-Peak must include holidays and Saturdays when a majority of households are home demanding electricity for their life uses and comforts.

Kwh Charges.

IPCo has not set forth it's Application IPC-E-23-11 for rates co-generation customers would pay.. When those are applied the picture changes drastically and the value of co-generation is correspondingly increased.

The tables in the Application illustrate the disparity of paying non-Legacy customers a price and charging much higher rates for consuming power in Off-Peak periods in summer or non-summer.

Lastly, IPCo's costs, avoided or otherwise should be scrutinized intensely. IPCo has included in costs even the kitchen sink. IPCo points to inflation and increased wages. The Application was filed at a time when inflation was putting a strain on individuals and companies. At the end of the Comment period, we have seen inflation diminish and moderate and wage demand has also diminished or stayed stagnant. IPCo must not be granted to institute rates and time periods that have co-generators having their investments strangled at while IPCo seeks to be made whole on their costs of business and financing. The Commissioners must not penalize non-Legacy co-generators of any Class and deny or vastly alter or amend the IPCo Application in its Order."

Name: HAROLD JACKSON
Submission Time: Nov 8 2023 4:49PM
Email: hjackson7520@msn.com
Telephone: 208-794-5791
Address: 2594 NE Reservoir Rd
Mountain Uome, ID 83647

Name of Utility Company: Idaho Power

Case ID: IPC-E-23-14

Comment: "The Public Utilities Commission (PUC) must not approve any part of this proposal. The way I understand this proposal is, Idaho Power wants to cut credits by approximately 50% and then charge solar customers for using power they put on the grid. If any portion of Case IPC-E-23-14 is approved, then all Idahoans will know the commission works for Idaho Power. Idaho Power is attempting to increase profits at the expense of those who have installed solar panels. If Case IPC-E-23-14 is approved, I hope somebody with solar or planning to install solar initiates a lawsuit to stop Idaho Power from implementing any changes to net metering. The lawsuit needs to require the PUC to have another VODER study completed by an independent third party."

The following comments were submitted via PUCWeb:

Name: GARY RICHARDSON
Submission Time: Nov 8 2023 5:48PM
Email: garyerichardson@gmail.com
Telephone: 208-336-2128
Address: 746 N SANTA PAULA CT
BOISE, ID 83712

Name of Utility Company: Idaho Power

Case ID: IPC-E-23-14

Comment: "My name is Gary E. Richardson. I have been an Idaho Power customer for more than 40 years, since 1986 at 746 N. Santa Paula Ct., Boise, ID 83712-6564, where our service is listed under my wife, Diane Ronayne, who endorses this statement.

From 1986 through 1996, I was the Idaho PUC's public information officer. My job required me to explain the commission's cases and decisions to the news media, other agencies, and the public, at which I excelled for more than a decade. The complexities of this case have baffled me and, apparently, Idaho Power's own customer service personnel.

In 2020, we decided to “bite the bullet” and go solar. We felt that, in light of the pandemic, we could help solar installers during a challenging time as well as provide additional energy security for our household should things “go haywire.” We spent about \$24,000 to have 24-330W solar panels installed on our roof, for a total capacity of about 8 kilowatts. We are unlikely to live long enough to benefit financially from that investment, but we knew it was the “right thing to do” environmentally and in support of IPCo's pledge to move away from fossil-fuel generation, especially coal.

Since our system became fully operational in July 2020, we have eliminated all but the \$5 service charge, 8¢ franchise fee, and 16¢ energy efficiency charge on our monthly power bill. During the four “peak” months of June–Sept we continue to receive the \$5 A/C Cool Credit, which offsets the service charge during that period, allowing the company to interrupt our air conditioner to help manage its system peaks.

Earlier this week, I spoke with one of the company's customer-generation specialists in hopes that she could tell me what the impact of the IPC-E-23-14 rate proposal would be on our bills. We acknowledge that we are not “grandfathered” into the net-metering arrangement. However, the meter installed for our solar system in June 2020 is capable of metering our usage patterns as would be required for the rates proposed in this case. Unfortunately, the customer-generation specialist was unable to retrieve the necessary usage history to calculate what our bills would have been under the rate structure proposed in this case. The best she could do was estimate that the new rates would add about \$10 to \$15 per month to our bills—\$120 to \$180 per year.

It is unfair for the company to implement a new rate structure until it can demonstrate the impact on its customers. I understand that, in effect, I am using Idaho Power's generation capacity in lieu of a battery. However, without knowing the impact the new rates will have, I cannot make an educated estimate of the cost/benefit acquiring a battery for my system, which would give us the added security of having power when Idaho Power's system is down. We have experienced several IPCo outages that have left us unable to access our own generation.

Another concern is the proposal's use of the eight-hour period from 3 p.m. to 11 p.m. from June 15 to Sept. 15 as the system peak. That seems terribly inexact. Given the sophistication of the meters being used and the company's access to its actual system usage data, a much more accurate, rolling cost could be calculated.

We support the Idaho Conservation League's suggestions that the company phase in a new rate structure for customer-generators, with more detailed information about its impact on customers like us.

A final note: Idaho Power pitches this request to change its on-site, self-generation rates as a matter of “equity and transparency among customers.” It claims that net-metering customers are being subsidized by other customers. We are not aware that any customer group has raised this “fairness” issue. In my several decades of following IPCo's appearances before the commission, it's been rare to see the utility raising concerns about equity and transparency among its customers. This case certainly fails in

transparency; even its customer-service personnel are at a loss to explain the proposal's impact on individual customer's bills.

It appears to us that the actual purpose of this case is to slow down customers' investment in their own generation capacity in favor of the company's monopoly position. A creative, forward-looking utility would find ways to use its rate-basing capability to encourage installation of distributed generation capacity on its customers' roofs. The current proposal does the opposite. "

Name: Lloyd Berriman Jr
Submission Time: Nov 8 2023 6:17PM
Email: mathosaur271@gmail.com
Telephone: 818-298-2746
Address: 865 E Finch Creek St
Meridian, ID 83646

Name of Utility Company: Idaho Power

Case ID: IPC-E-23-14

Comment: "I worked five additional years and retired at 70 to assure my remaining years were affordable. I took moneys I saved during those last five years to purchase solar panels to reduce my impact on the grid and lower my costs.

Now I am told my investment was for naught, and I will be unable to plan for my monthly utility bill because the rates will be fluid. It is unacceptable that I will not be able to determine my bill. It is unacceptable I cannot figure my cost because the billing is so convoluted and complex.

I expect a return on my investment. I thought I was doing the right thing to help myself, my neighbors, and the plant. Instead, I have been played.

This rate structure has to be rejected. Utilities exist for the people using them and the rates and billing need to be understood by them. Not interpreted by some experts."

Name: Lloyd Berriman
Submission Time: Nov 8 2023 6:33PM
Email: lloydberriman@gmail.com
Telephone: 818-298-2746
Address: 865 E Finch Creek
Meridian, ID 83646

Name of Utility Company: Idaho Power

Case ID: IPC-E-23-14

Comment: "How much money dis Idaho Power make in the first two quarters of 2023? Hundreds of millions of dollars? They clearly had the resources to invest in an understandable rate schedule for those of us who invested on solar. But no, now they are hitting us hard with a totally baffling billing and rate schedule.

When I retired, I purchased a house built in 1986. Then I invested in solar to reduce my impact on the grid and hopefully allow me to heat and cool my home in my waning years. But now I am told the cost of maintenance of the grid is my problem? What about the impact of all the new construction? Wasn't the grid operating efficiently until the heavier demands? Why are developers being levied? Why aren't the people buying the new construction having to pay the heavier load (a two/three tier rate system)? These rate suggestions are outlandish. I have a degree in and taught mathematics and I cannot understand the suggested billing. The rates and billing are unintelligible. My wife worked in banking and she is appalled that our return on investment is negative! We thought we were doing something good, both for ourselves and the grid by installing solar panels. Now we are the bad guys being hit with this garbage. What is Idaho Power thinking to even put this forward? Please, let us see a return to common sense and common decency."

Name: Alex Brun
Submission Time: Nov 8 2023 7:39PM
Email: alexjbrun@gmail.com
Telephone: 360-359-3700
Address: 744 Deer Forest Dr
McCall, ID 83638

Name of Utility Company: Idaho Power

Case ID: IPC-E-23-14

Comment: "I'm a father of two young children and I'm concerned about the effects of climate change on their future. That is why my wife and I have installed solar panels on our home. I'm concerned about the potential change to net metering and the negative impact it could have on the installation of roof top solar in Idaho. After reviewing the facts of the case, I believe Idaho Power's proposal to change net metering with make it less attractive for other Idaho Power customers to install roof top solar on their homes. This proposal unfairly discriminates against future roof top solar adopters. I believe that the PUC needs to encourage the increase of solar panels in Idaho. Therefore, I ask the PUC the following 3 things: 1. Resolve the Rate Case before making any changes to the Net Metering program. 2. Set the initial export credit rate to 10 cent per kilowatt per hour. 3. Let customers lock in their initial rate for at least 10 years.

Thank you for your consideration in this matter. "

Name: Joshua Powell
Submission Time: Nov 8 2023 10:05PM
Email: josh@revolusun.com
Telephone: 808-754-0571
Address: 1337 Lick Creek Road
McCall, ID 83638

Name of Utility Company: Idaho Power

Case ID: IPC-E-23-14

Comment: "Idaho Power's rate case proposal is unfair to consumers. It does not adequately value the many benefits of grid-tied, consumer owned solar systems such as energy system resilience, elimination of fossil fuel related pollutants, reduction of power generation investment needs, free market influence over our energy and local job creation. These benefits more than make up for distribution improvements that Idaho Power cites as a rationale for eliminating 1:1 net metering (improvements that in many cases are overdue long before consumer solar became a convenient justification). Consumer solar systems will also form the backbone of the energy system of our future where Distributed Energy Resources augment the grid to make it more flexible in responding to threats as varied as cyber-attacks, grid stability events and climate change. The PUC should focus on implementing rules that will encourage Idaho's transition to this future instead of trying to stifle it to preserve and outdated monopoly utility model. Lastly, should a rate change be approved (and it shouldn't) existing solar customers should ALL be grandfathered into their existing net metering up to the point of any rate change."

The following comment was submitted via PUCWeb:

Name: Patti Raino
Submission Time: Nov 8 2023 10:00PM
Email: pattiraino@yahoo.com
Telephone: 208-336-2280
Address: 4905 W Outlook Ave
Boise, ID 83703

Name of Utility Company: Idaho Power

Case ID: ~~IPC-E-24-15~~ **IPC-E-23-14**

Comment: "Idaho Power is seeking to reduce the rate it compensates me for the energy they use from my installed solar system. My system was installed in February 2021. I disagree that my system is somehow costing other Idaho Power customer's a fair rate for their electricity. I oppose any change to the current system of billing for my electrical system usage that provides offsets to my bill based on the solar production.

Thank you,
Patti Raino "

Re: Case No. [IPC-E-23-14](#)

From: obid@juno.com <obid@juno.com>
Sent: Wednesday, November 8, 2023 1:05 PM
To: Jan Noriyuki <jan.noriyuki@puc.idaho.gov>
Subject: Comments on PUC Case Number IPC-E-23-24

Dear PUC,

I would like to express my opposition to the changes which Idaho Power wishes to make regarding solar power. It certainly seems as if they want to discourage rooftop solar generation by increasing fees and decreasing what they credit for excess power generation. Instead of discouraging rooftop solar, we should be encouraging it. There are many schools and businesses that could install solar and cut their power needs. I suppose Idaho Power sees this as a threat. Your job is not to make sure Idaho Power makes a lot of money, but to make sure things are fair. These changes would not be fair. Please think about the importance of moving away from fossil fuels toward more solar and reject Idaho Power's proposals.

Sincerely,
Kathy O'Brien
1136 S. 3rd Ave.
Pocatello, ID 83201

Re: Case No. IPC-E-23-14

From: Annik Martin <annik_martin@hotmail.com>
Sent: Wednesday, November 8, 2023 1:37 PM
To: Jan Noriyuki
Subject: Comments on PUC Case Number IPC-E-23-24

The transition to renewable energy sources is gaining momentum, and Idaho is no exception. With its abundant sunshine and wind resources, Idahoans are increasingly investing in solar and wind power systems, often generating excess electricity that is exported to the grid. It is essential for Idaho Power to fairly and fully compensate individuals for the surplus energy they provide. The following explains why compensating Idahoans fairly and fully for the excess power they export to the grid is not only beneficial to these individuals but also a smart strategy for Idaho Power.

Encouraging Renewable Energy Adoption

Fair compensation for excess power incentivizes individuals to invest in renewable energy systems, such as solar panels and wind turbines. When homeowners and businesses see a direct financial benefit from generating surplus clean energy, they are more likely to make these investments. This, in turn, accelerates the adoption of renewable energy technologies, reducing the reliance on fossil fuels and lowering greenhouse gas emissions.

Enhancing Grid Resilience and Reliability

Fair compensation for excess power encourages the integration of distributed energy resources into the grid. By doing so, Idaho Power can enhance grid resilience and reliability. The surplus energy generated by distributed sources can be utilized during peak demand periods or during

grid failures, reducing strain on the utility and ensuring a stable power supply for all customers. This makes the grid more resilient to disruptions caused by severe weather events or other unforeseen circumstances.

Cost-Effective Energy Generation

The excess power generated by individuals and fed back into the grid can be considered a cost-effective source of energy. This reduces the need for Idaho Power to invest in new power generation infrastructure, saving on capital expenses. Furthermore, the electricity generated by individuals is typically generated during peak daylight hours when energy demand is high, which can help reduce the cost of peak energy procurement, ultimately benefiting all customers.

Building Positive Customer Relations

Fairly compensating customers for their excess power fosters a positive and collaborative relationship between Idaho Power and its customers. It demonstrates a commitment to recognizing the value of renewable energy contributions made by individuals. Such a commitment can improve customer satisfaction and loyalty, which is essential for the long-term success of the utility. A satisfied customer base is more likely to support the utility's initiatives, including grid modernization and sustainability goals.

In conclusion, fairly and fully compensating Idahoans for the excess power they export to the grid is a mutually beneficial arrangement. It encourages the adoption of renewable energy technologies, enhances grid resilience and reliability, reduces operational costs, builds positive customer relations, and ensures compliance with evolving regulatory standards. Idaho Power can foster a sustainable and prosperous energy future by embracing fair compensation for excess power, all while maintaining its commitment to serving the best interests of its customers and the environment. This win-win approach sets the stage for a more sustainable and resilient energy ecosystem in Idaho.

Thank you for your time,
Annik Martin
1490 Aramis
Pocatello, ID 83204

From: Cody Hukill <cody.hukill@revolusun.com>
Sent: Wednesday, November 8, 2023 3:30 PM
To: Jan Noriyuki
Subject: IPC-E-23-14

Good afternoon,

I am writing you in regards to IPC-E-23-14, and asking that you would carefully consider denying the mentioned proposal. Passing the proposal would negatively impact not only everyone working in the solar industry, but also all of the customers current, and future. Renewable energy has so many benefits for not only the environment, but also the end users that we should be encouraging as many people as possible to jump on board. Thank you for your time, and I hope you have a great day!

Respectfully,
Cody Hukill

Journeyman Electrician

idaho.revolusun.com

457 N Steelhead Way, Boise, ID 83704
P.O. Box 1118 McCall, ID 83638
208.315.4082 Office 208.794.0561 Cell

From: Anika Miller <anika.miller@revolusun.com>

Sent: Wednesday, November 8, 2023 8:22 PM

To: Jan Noriyuki

Subject: IPC-E-23-14

Dear Commissioners,

I am an Idaho Power customer who could not attend the Twin Falls hearing due to a family emergency. Below is my verbal testimony:

Thank you for traveling to Twin Falls to listen to each of us. As our representatives, we rely on you to preserve our communities wellbeing, and ensure fair and affordable utility rates for all Idahoans.

I'm sure you are aware that we are knocking on the door of the largest energy transition in human history. This is our opportunity to define Idaho's role in that transition, and involvement in a trillion dollar industry. Idaho Power's proposed changes to net metering are a step in the wrong direction.

Idaho should be expanding access to distributed energy resources. Expand individual access to solar, solar+storage, wind, and other efficiency improving technologies. Why?

Utility scale DER's do not provide the same benefits to our local communities that customer owned, net metered systems do.

- Utility scale projects don't bring in nearly as many jobs for local Idahoans, and the projects don't benefit our local businesses.

- Utility scale DER's don't provide backup or resiliency to my community. The full capabilities of the technology is not realized.
- Often, large scale DER's are installed on single use land and incur significant local opposition. Why not incentivize utilizing our rooftops?
- Utility scale renewables are notoriously difficult to plan, permit, and interconnect. Just look at Lava Ridge.

Here are a few real world examples of DER's value:

DER's provide early detection of transmission equipment issues on remote, un-monitored lines. It's no secret our grid is aging and equipment will fail. A solar+storage system installed in the WRV detected a mechanical failure in a voltage regulator. Idaho Power was delivering power well ABOVE the mandated 5% of nominal voltage for an unknown period of time. This is a safety issue that impacted hundreds of customers. DER's provide significant grid safety improvements.

In Lahaina, homes with solar plus storage became the lifeline of the community after the wildfires. They provided power for locals to charge phones and contact their loved ones. DER's provide effective community resilience.

Speaking of wildfires, what happens to utilities who are implicated in causing wildfire events because of downed lines? They file for bankruptcy. That's bad for Idahoans and our economy. DER's can be placed within our remote communities to minimize the need for new above ground transmission as our population grows and electrification expands, and to keep the power on during high fire danger.

Finally, commissioners, are you familiar with the latest technologies and developments in the energy sector? Virtual power plants, AI technology to optimize DER placement and grid stability, commercial scale microgrid and backup solutions to make all of our utilities and critical infrastructure more reliable.

Commissioners, as our representatives, I encourage you to ask me questions and engage with your constituents. Please show me that you are listening and working to fully understand our feedback.

I truly appreciate your time and representation.

Anika

--

Anika Miller | Project Engineer

REVOLU(SUN)
cleaner. smarter. solar.

idaho.revolusun.com

457 N Steelhead Way, Boise, ID 83704

PO Box 1118, McCall, ID 83638

208.315.4082 Office 208.315.2240 Cell

From: Alex McKinley <mckinleyalex@gmail.com>
Sent: Wednesday, November 8, 2023 8:57 PM
To: Jan Noriyuki
Subject: IPC-E-23-14 Onsite Generation Case Comment

I urge the Commission to reject Idaho Power's proposal in this case. There are a great many issues with what they have presented and the best course of action would be to begin again and actually attempt to develop a rate structure that is fair to both customers with solar and those without. This can be achieved. There is an outcome that is beneficial to all of the different groups involved. That solution is a rate structure that adequately values local distributed generation and doesn't unfairly disincentivize people from choosing that option. The result will be a more modern, dynamic, and resilient grid.

The most straight forward and obvious reason for rejecting the proposals in this case is the conflict it brings up when considered along with the General Rate Case. Currently ([IPC-E-23-11](#) – general rate case) is also taking place and it will have significant bearing on all customers (regardless of whether or not they have solar). In both cases Idaho Power claims that fixed cost recovery is the basis for significant modifications to the rate structure. As reported by the Idaho Press on October 29th, "Customers without rooftop solar pay an unfair share of grid maintenance and improvement costs. The changes we have proposed will help update the credit so it is sustainable and fair for all customers." - Idaho Power Spokesperson Jordan Rodriguez. Idaho Power is proposing to significantly increase the flat monthly fee for all customers from around \$5/month to about \$35/month. In relation to the solar case (this case), the rate structure that the proposal is based upon may drastically change. This means that Idaho Power's entire argument that customers with solar aren't paying their fair share of fixed costs may not be applicable. If all customers are paying a much greater portion of bills related to fixed cost recovery, then onsite generators may very well be over paying if the proposals in these two cases are passed. By bringing these two separate cases that are so closely intertwined, to the PUC at the same time, they are attempting to have their cake and eat it too. It is a very underhanded tactic. **Recommendation: The PUC should reject the entire proposal in the solar case and start from square one after a result in the General Rate Case has been determined.**

There are many other problems with this proposal, some of them described below:

- Another worrying portion of this proposal is that times proposed by Idaho Power for variable time pricing are very dubious. Idaho Power currently has a Time-Of-Use Pricing option to which customers can opt-in. The goal of this is to incentivize customers to use less electricity when prices and demand are high (generally summer afternoons) and less during lower cost times. For a number of years customers with solar have not been allowed to opt-in to this pricing model. Idaho Power's current proposal adds Time-Of-Use pricing for customers with solar, but sets different time periods than what are currently used for non-solar customers. The time difference would be obviously disadvantageous to customers with solar. The rationale for setting these time periods is not clear. **Recommendation: The rationale for setting the variable time pricing should be transparent, times should be based on the market cost of electricity and system demand, times should align with Time-Of-Use pricing for customers without**

solar. There should also be middle tiers as actual pricing is not only very low and very high.

- Idaho Power proposes real-time metering instead of netting imports and exports on an hourly or daily basis. This is overly complicated for the average customer to deal with and is an obvious way for the utility to nickel and dime customers, when the result would not be noticeable on their system. **Recommendation: If Time-Of-Use pricing is used, then netting periods should be on a daily basis and match daily pricing periods.**

- The procedure setup in this proposal for updating credits is confusing and vague enough that it leaves open the opportunity for Idaho Power to take advantage of customers with solar by reducing rates down the road. **Recommendation: Start over and actually work with stakeholders in a genuine way to create a rate structure and update procedure that is fair and will promote a dynamic, modern, flexible, and resilient electrical grid in the future.**

- The PUC has done an extremely poor job of engaging with the public throughout this case. Most cases they see do not generate much public involvement, so when there is obvious public interest they should see that as a positive and work to make hearings, comment opportunities, and participation easy and available for all who are interested. Short notice for hearings, hearings scheduled during working hours, and no virtual options make it seem that the PUC is attempting to limit public participation instead of promoting it. **Recommendation: Start over with a process that engages the public from the start. Begin by asking utility customers what they want from rate design and engaging the public throughout the process. While it is obvious that nobody will get everything they want, the PUC should be working with the public's best interests in mind, not at the behest of an investor-owned monopoly.**

Alex McKinley
Idaho Power customer
1407 E. Jefferson St. Boise, ID 83712



Public Hearing City Twin Falls

Date Nov 8, 2023

COMMENT FORM

Please use the space below to file a comment in this case. Add extra sheets as needed.

You may either hand this sheet to a commission staff member or mail it to:

IPUC, PO Box 83720, Boise, ID 83720-0074

You may also post comments on our website:

<https://www.puc.idaho.gov/>

Click on the "Case Comment Form" link

Multiple horizontal lines for writing a comment.

The following information is required for your comment to be filed with the case. (Note: When submitting a Comment in a current case, the Comment constitutes a public record under Idaho Code § 9-337(13). All information you provide is available for public and media inspection and may be reviewed by the utility.)

Print Name Melody Asher Sign Name Melody Asher

Address 2502 Laurielane Phone Number 208-595-1035

City, State, Zip TF 83301 Email mashermcbride@gmail.com
ID

Case IPC-E-23-14

November 8, 2023

Dear Public Utilities Commission

~~We have solar panels~~

I believe that local solar power is important for our community and our world especially because of climate change. Idaho Power says it wants to have 100% clean energy by 2045 so they should be happy to have customers generating power! But instead, Idaho Power seems to be discouraging rooftop solar and I think that prospective rooftop solar customers should be able to lock in a price for at least 10 years so they can figure out if it is even feasible to put panels on the roof.

Idaho Power gets paid by the rooftop solar customer's neighbors for the excess exported power. There is not much line loss & they get paid full amount for that power and they don't have to generate that power. I think that they can even sell that power at a more expensive rate through their Green Power Program. They should be happy to have rooftop solar panels making power for them but for some reason they are not and they are fairly tenacious about not supporting rooftop solar.

Idaho Power does not want to pay rooftop solar owners a fair rate for the power that they generate so I hope that you will insist on a fair amount of compensation for rooftop solar customers.

Please vote against this proposal
I also feel that the General Rate Case should be decided first – it will impact ALL customers in a really big way if you OK Idaho Power's proposal. I will expand on that in my letter and/or at the November 27th hearing on IPC-E-23-11 case.

Thank you for listening to me again - Melody Asher

2502 Laurie Lane

Twin Falls, ID 83301



Public Hearing City Twin Falls ID

Date 11-8-23

COMMENT FORM

Please use the space below to file a comment in this case. Add extra sheets as needed.

You may either hand this sheet to a commission staff member or mail it to:

IPUC, PO Box 83720, Boise, ID 83720-0074

You may also post comments on our website:

<https://www.puc.idaho.gov/>

Click on the "Case Comment Form" link

IT is about Twin Lake power

started encouraging rooftop solar instead of

discouraging it. And pay a fair rate

Idaho Power needs competition

The following information is required for your comment to be filed with the case. (Note: When submitting a Comment in a current case, the Comment constitutes a public record under Idaho Code § 9-337(13). All information you provide is available for public and media inspection and may be reviewed by the utility.)

Print Name Rick Hiatt Sign Name Rick Hiatt

Address 781 E 720 N Phone Number 208-731-2187

City, State, Zip Richfield, ID Email _____



Public Hearing City Twin Falls

Date 11/8/2023

COMMENT FORM

Please use the space below to file a comment in this case. Add extra sheets as needed.

You may either hand this sheet to a commission staff member or mail it to:

IPUC, PO Box 83720, Boise, ID 83720-0074

You may also post comments on our website:

<https://www.puc.idaho.gov/>

Click on the "Case Comment Form" link

I believe it is past time to lessen our dependency on fossil fuels and transmission (sp) to more green energy like solar & wind. We all are going to have to bite the bullet and make the change or we might as well kiss planet Earth goodbye. Idaho Power needs to start thinking more about the planet than their profits.

Thank you for considering it.

The following information is required for your comment to be filed with the case. (Note: When submitting a Comment in a current case, the Comment constitutes a public record under Idaho Code § 9-337(13). All information you provide is available for public and media inspection and may be reviewed by the utility.)

Print Name MARSHA HIATT

Sign Name Marsha Hiatt

Address 781 E. 720 N. Richfield, ID.

Phone Number (208) 969-0919

City, State, Zip RICHFIELD, ID. 83349

Email _____

My name is Bob Sojka. I live at 2506 Laurie Lane in Twin Falls County. 11/08/2023

I am strongly opposed the Idaho Power's latest efforts to discourage and disincentivize the expansion of rooftop solar power generation by homeowners and businesses. They should be doing the exact opposite.

I view this latest attempt to ratchet up the monthly fees charged to existing owners of rooftop solar generation systems as the second bait and switch that Idaho Power has orchestrated since its original proclamation a number of years ago that it was going to be a strong proponent of renewable power. This time around it intends to also renege on system owners it had vowed to grandfather in under the conditions initially promised. .. Albeit even then the grandfathering had an arbitrary time limit imposed, which had not been part of the original stipulations under which some of us early solar installers invested our money.

Idaho Power does not recognize or give adequate credit/or appreciation to the participation of individuals helping Idaho achieve energy independence via renewable energy strategies. Rooftop solar systems represent substantial financial, labor and logistical commitments by homeowners. Much of that commitment is pure altruism. However it represents an enormous removal of financial, labor and logistical burden from Idaho Power in the meeting of its proclaimed goal of being free from non-renewable energy strategies. Rooftop solar also relieves the State of Idaho from subsidizing massive stationary single point generation facilities at taxpayer expense.

Rooftop solar installations incur the least destructive environmental footprint involved in power generation. Placement atop a roof helps mitigate the existing negative environment footprint of the house itself. And there is no long distance resistance-induced power transmission loss.

Many of us (most of us?) that generate power from our rooftop solar systems produce more power per month than we use. We don't get paid for the excess power we produce, it feeds into the grid, and Idaho power sells that excess to other users that do not generate their own power. Yet, the new proposal under consideration would require us to pay more per month to give away our excess generation so Idaho power can sell it for additional profit.

If Idaho power really wants to achieve energy independence via renewable resources it should be further incentivizing property owner installation of on-site renewable generation, whether, solar, wind or micro hydro, not penalizing it. And in fact, if anything it should be considering a strategy of raising rates for power users that make no effort whatsoever to provide onsite generation of any fraction of its energy needs.

The issue of becoming energy independent with renewable generation sources is existentially significant enough that, in my personal opinion, it should be taken out of the hands of the entangled reward interests of the PUC and legislature and offered to the voting public at large, who I suspect have a better financial and fairness compass on this important aspect of their daily existence.

Thank you for your time and consideration.

IPC-E-23-14

November 8, 2023

To Public Utilities Commission –

Hello, my name is Michael McBride. I am an Idaho Power customer and a rooftop solar producer who lives in Twin Falls, Idaho.

First, I would like to thank the Idaho PUC for coming to Twin Falls Idaho for this hearing with the public. This will be my 3rd hearing where I have presented testimony to the PUC on residential rooftop solar. The first hearing was held in Pocatello – I believe in 2018. My second time of addressing you was in December 2019 in Boise on the “settlement agreement”. After the Boise hearing I was very pleased how the PUC listened to Idaho Power customers and came up with “grandfathering” for those of us who already had solar in place. Here we are back at it again on November 2023. Idaho Power still controls the data, comes up with the plans, hires lawyers, professional spokespersons, and in general out guns the scattered individuals who make up rooftop solar and small electric generators (less than 2% of their customers). We are counting on Idaho PUC to treat both sides fairly.

We did not buy our solar system to make money. We bought our solar system because we felt it was the right thing to do. We would hate to see Idaho Power be able to scuttle interest in rooftop solar going forward. Solar power is part of the solution for global warming. If Idaho Power is able to make it economically unfeasible for small electric generators then people won't do the right thing and people won't bother with it.

Also the less solar that gets sold the less installers and maintenance people will be available when our system needs repaired some day.

Thanks – Michael McBride

Michael McBride
2502 Laurie Lane

Twin Falls, ID 83301