Name: Jeffrey Klingler
Case Number: PAC-E-19-08
Email: jklingler@gmail.com
Telephone: 208-881-3607
Address: 2558 Bungalow Dr
Idaho Falls, ID 83401

IPUC Commissioners,

In Pacificcorp's application to the Idaho Public Utiltiies Commission to end schedule 135 it states: "On June 20, 2003...participation [in net metering was] capped at 714 kilowatts, or one-tenth of one percent of the Company's 2002 retail peak demand." As of Feb 2016, this cap has not yet been reached meaning the number of net metering customers continues to be a very small, but growing part of their customer base. It is unknown what the retail peak demand was in Feb 2016, but it is expected that net metering is still a very small fraction of a percent of all power demand as peak electricity demands have continued to rise since 2003. I would suspect that the proposed cap increase to 2000kw that was denied back then is even less than the one-tenth of one percent of today's retail peak demand benchmark set in 2002.

Power generators of all types (nuclear, coal, wind, solar) expect to see a return on their investment. This proposal to the commission to remove the current Net Metering schedule significantly alters the incentives (which are already relatively low in Idaho with cheap power and minimal state tax incentives) for those who want to become more independent from Pacificorp's services. Pacificorp has its profit levels set by the commission to ensure that it does not use its monopoly status to unfairly take advantage of customers. This proposal unfairly singles out a very small portion of their customers to reduce or remove the profit potential of net metering and ensure that they remain a part of Pacificorp's monopoly as the cost to obtain power generation has dropped tremendously for both utilities and its customers.

Pacificorp's application states: "net metering customers use the Company grid virtually all the time". This is untrue. Those that have generation facilities use the grid less than other customers. Especially those that have battery backup as they can use their solar generation when the electric grid is down and can shift usage from peak periods thereby reducing costs for everyone. Pacificorp does not have any proposal to the commission in place for fairly compensating customers that have local storage facilities and can export this power during peak periods. It would be expected that these net metering customers would be compensated above the retail rate to help offset their investment in local storage combined with local generation.

Using more advanced energy storage such as the Tesla PowerWall can automatically charge up to full capacity when significant storms are forecasted thereby helping reduce the impact on neighborhoods from one of the most common sources of power outages. This is especially true during winter storms (commonly found in their service region) that prevent their customers from being able to efficiently use natural gas or electric heating. The impacts of having no heat can result in catastrophic damage to a customer's residence in the form of frozen pipes all of which Pacificorp is not held liable. Much of

Idaho has a culture of being independent and being prepared for taking care of one's own needs. The Idaho Public Utilities Commission should be concerned about the impact of this proposal of their customer's to be resilient over the long term.

Cyber-attacks against utilities have already taken down power to significant areas of the world (Ukraine) multiple times. Adversarial nation states have a high interest and invest considerable resources in gaining the ability to cause long term power outages. They understand how important electricity is to the functioning of society, the government, and the military. This is evidenced in how many US Department of Defense facilities are now generating their own power. Distributing generation closer to customers can help make the grid and communities more resilient. Utilities in the United States continue to struggle with how to defend their systems against well-resourced adversaries that do not give up. These benefits of local power-generation are not factored into Pacificorp's proposal.

A better solution would be to completely break out the cost of operating the grid from the actual cost of electricity consumed. All customers would be responsible (not unfairly giving any customer the advantage) for their portion of the operating costs vs. bulk power costs. Pacificorp's proposal transfers profits from their customers to the company itself as the utility can resell that power for more than the cost of production. Pacificorp has failed to demonstrate that any harm has occurred to any customer from the current net metering program. However, this proposal would harm its net metering customers. Changes to net metering in Utah has had a significant impact in residential solar installs and would be expected to do the same in Idaho.

The application further states: "The Company believes that the subsidies embedded within the current compensation structure in Schedule 135, and the decreasing prices of customer generation facilities, particularly rooftop solar, will continue to encourage participation in the Net Metering program to unsustainable levels." Belief is not evidence. If the value of electricity exported to the grid from solar arrays is worth less than the retail rate, why doesn't Pacificorp pass on these savings to all of its customers during these times of the day? This would help encourage customers to find ways to shift their usage from peak periods.

Federal incentives for installing utility scale solar are more generous in that they continue after the residential credits have ended. As these federal incentives start to fade, the number of new residential net metering customers will naturally decline without any action required on the part of Pacificorp or the IPUC to reduce the impact of doubling net metering participation to .002% of customers. I would hate to see the impact of tripling participation to .003% of customers.

Pacificorp has failed to quantify the cost of the extremely small Net Metering program to any of its other customers and therefore cannot adequately estimate what its net metering customers should pay for power exported to the grid. It also fails to quantify the benefits of distributed generation and the impact of declining federal tax incentives in the coming years.

Respectfully,
Jeff Klingler