

To: Idaho Public Utility Commission (Case No. PAC-E-19-08)

Subject: Response to Rocky Mountain Power's Proposed Net Metering for Idaho Customers

Date: June 20, 2020

The following is my response to Rocky Mountain Power's Proposed Net Metering for Idaho Customers, filed on June 14, 2019, with the Idaho Public Utility Commission. My specific questions and comments regard proposed changes to current Net Metering customers.

For background, I am a current Net Metering customer on Schedule 135 with Rocky Mountain Power (RMP). I installed a photovoltaic (PV) system on my primary residence in two phases – one in 2015 and the other in 2017. I only installed PV panels that reasonably and evenly fit on my south-facing roof, amounting to a small fraction of the allowed 25 kW electric production capacity for a customer-generator. My system generates net energy on an annual basis.

I chose to become a customer-generator based on environmental responsibility and incentives offered by RMP. Specifically, RMP's Electric Service Schedule No. 135 at the time of my installation states the customer, "... shall be financially credited for such net energy at the Customer's standard service schedule retail rate." Furthermore, RMP Net-Metering Program specialists at the time of my installation informed me that financial credits may accumulate indefinitely for Idaho customers, and that I could receive a cash payment for accumulated credits upon request.

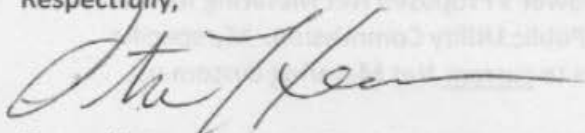
Now, fewer than three years after my PV system installation and after a significant financial commitment on my part, RMP is proposing to move its Net Metering customers following a 10-year grandfathering period to a new Net Billing Service on Schedule 136, which would (1) drop the net energy rate from a retail rate to an Export Credit rate (~ 2.2 cents/kWh) and (2) expire unused financial credits annually. My primary question is, "How is this not a bait-and-switch maneuver?" Had I known that RMP had the latitude to unilaterally change the terms and conditions of its agreement, I would have approached my PV system installation differently. Yet, I entered interconnection agreements with RMP in good faith and made significant financial outlays toward them. Consequently, I request that RMP keep its part of the agreement and maintain the Net Metering on Schedule 135 as is for current Net Metering customers.

RMP's concern that Net Metering customers are being subsidized by non-net metering customers for net energy to the grid and its consequent proposal to close Net Metering on Schedule 135 to new customers to curb this subsidy is understandable. But it does not justify a unilateral change in terms and conditions with current Net Metering customers, who have made irreversible financial investments in their electric power generating systems. I submit that the subsidy to current Net Metering customers will naturally decline over time due to (1) attrition of current Net Metering customers through change of ownership of generating properties and (2) natural decline of PV system generating rates over time, which by industry

standards are ~1%/yr. Consequently, moving current Net Metering customers to a Net Billing Service is neither warranted nor necessary.

Thank you for hearing my concerns and considering my request for RMP to maintain the Net Metering on Schedule 135 as is for current Net Metering customers.

Respectfully,



Steven Herrmann
2487 Sunnyvale Way
Idaho Falls, ID 83402