

**From:** CenturyLink Customer <[steveandlaura@q.com](mailto:steveandlaura@q.com)>

**Sent:** Saturday, June 20, 2020 4:14 PM

**To:** Diane Hanian <[Diane.Hanian@puc.idaho.gov](mailto:Diane.Hanian@puc.idaho.gov)>

**Subject:** Case No. PAC-E-19-08

Name: Steven Herrmann

Email: [steveandlaura@q.com](mailto:steveandlaura@q.com)

Telephone: 208-529-0484

Address: 2487 W Sunnyvale Way

Idaho Falls, ID 83402

Name of Utility Company: Rocky Mountain Power

Contacted Utility: Yes

Comment: "Rocky Mountain Power's Proposed Net Metering for Idaho Customers, filed on June 14, 2019, with the Idaho Public Utility Commission constitutes a unilateral change to the interconnection agreement I have with Rocky Mountain as a current Net Metering customer. I request that Rocky Mountain Power maintain the Net Metering on Schedule 135 as is for current Net Metering customers. My concerns are detailed in a separately submitted letter to the Idaho Public Utility Commission dated June 20, 2020."

**From:** Jeff Klingler <[jklingler@gmail.com](mailto:jklingler@gmail.com)>  
**Sent:** Monday, June 22, 2020 12:55 PM  
**To:** Diane Hanian <[Diane.Hanian@puc.idaho.gov](mailto:Diane.Hanian@puc.idaho.gov)>  
**Subject:** PAC-E-19-08 Case Comments

-----

To summarize the reason for Pacificorp's application to end net metering they are very concerned that 1.49% of their customers in Idaho who have net metering are being subsidized by those who don't at the tune of 10 cents per kWh. This is from an investor owned utility that has its profits (pretty much guaranteed) set by the IPUC. They are concerned that the recent large increase in net metering customers will make net metering unsustainable and assume that growth rate will continue into the future. Pacificorp's proposed net-billing rate is not based on reality or on any in-depth research. They do not consider the other benefits of solar, batteries, and smart inverters. Pacificorp is also looking to make credits expire as they are too difficult to track over the long term even though they have already resold that power and have no problems tracking money owed them. They want to treat net-metering customers as commercial power generators without any of the benefits such as actually being paid real money for the power they generate. Let's break this down:

**Growth:**

The reason for this growth in solar isn't because power rates in Idaho increased, are too high, or that state incentives are more attractive in Idaho, it's because individuals are looking to take advantage of expiring federal incentives. Pacificorp timed the submission of this application to when they thought demand for solar would be at an all-time high so that they would have a stronger case to kill net metering in their service area ensuring their monopoly stays in place. Their growth projections do not consider the expiring incentives.

**Proposed Rate:**

The utility states that currently 1,241 out of 83,000 customers are Schedule 135 customers or 1.49 percent of customers with a nameplate capacity of 9MW's. What is this as a percentage of 2020 peak retail demand for both power exported as well as nameplate capacity? Installed capacity is not equal to the amount of energy actually exported to the grid as much of it is consumed by the owner.

Rocky Mountain Power has its profits set by the Idaho Public Utility Commission. Pacificorp's investors are essentially guaranteed to make a profit as expenses are passed through and distributed across all customers in their rate cases. When Pacificorp makes investments to the grid in one area, those expenses are passed on to all customers across all areas. What Pacificorp is asking the IPUC to do is regulate away all the potential profits of individual power producers and pass those profits directly to Pacificorp which bears none of the investment cost or risk. At an export rate credit of 2.24 cents per kilowatt hour, the utility can then resell my solar power to my next-door neighbors at the average retail rate of 12.5 cents per kilowatt hour. This is a huge discrepancy for power that uses less of the electric grid infrastructure with fewer line losses than other power sources that aren't distributed closer to the end users. When I need

additional power than what I have produced I pay retail rates just like everyone else which funds the additional infrastructure when it is used.

There are also major assumptions made in determining the value of the solar such as the directionality of installed solar panels. Only 10 of my 34 solar panels face south, the other face west to soak up the evening sun. The evening is when power demand and rates are at their greatest. I also have Tesla Powerwalls so the majority of my excess power is sent back to the grid during the evening and used throughout the night from battery thereby reducing my energy consumption when demand is highest and power is most expensive.

**Expiring Credits:**

If I owe the utility money, that balance does not expire nor does the utility complain about the difficulty in tracking it. They convert my solar credits to dollars, but yet don't pay them out. They also don't pay interest on credits so through the time value of money and increasing electricity rates the value of those credits will be diminished. PacifiCorp should pay out credits so that they no longer have to track them. That would reduce the headache caused by tracking excess credits and allow consumers to earn interest on their proceeds of their investment. PacifiCorp resells the excess power generated. That income does not expire for the utility.

**From:** Rex & Betty Woodward <[centerworld52@gmail.com](mailto:centerworld52@gmail.com)>

**Sent:** Tuesday, June 23, 2020 9:49 AM

**To:** Diane Hanian <[Diane.Hanian@puc.idaho.gov](mailto:Diane.Hanian@puc.idaho.gov)>

**Subject:** CASE NO. PAC-E-19-08 IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER TO CLOSE THE NET METERING PROGRAM TO NEW SERVICE & IMPLEMENT A NET BILLING PROGRAM TO COMPENSATE CUSTOMER GENERATORS FOR EXPORTED GENERATION

## CASE NO. PAC-E-19-08

IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER TO CLOSE THE NET METERING PROGRAM TO NEW SERVICE & IMPLEMENT A NET BILLING PROGRAM TO COMPENSATE CUSTOMER GENERATORS FOR EXPORTED GENERATION

Dear Commissioner,

Please do not pass this proposal by Rocky Mountain Power. It is unfair on so many levels.

We attended the online meeting on June 18<sup>th</sup>, but were unable to attend the meeting last night. We hope that all of the concerns listed below have already been addressed and acknowledged.

The most grievous proposal by the power company is to delete any credit earned at the end of each year. That is criminal. That is basically stealing our power that has gone into the grid. We work hard to try to conserve and build up a credit so that we can have it, like a savings account, for future charges. The power company never pays us anything. We just get credited for the extra at the same rate we would be charged during the prime time when it is produced. The credit is ours. Please do not allow them to take it from us.

Rocky Mountain Power acknowledges that customers on Schedule 135 should be grandfathered in, which by definition should be forever, or as long as the customer continues to use a solar system. The staff proposes this be 25 years instead of 10. That is generous and probably would be the life of the system, but why hassle at all with time limits. If the customer updates his system, he should still be grandfathered in.

On Schedule 135, they are crediting us at the same rate we are charged, which is only fair. Rocky Mountain Power admits that exported power is worth just over 2 cents/KWH, yet they charge us almost 15 cents/KWH during the prime time our solar power is generated. In doing so, they have unknowingly admitted they are overcharging. This proposal should not only be defeated, but also Rocky Mountain Power should be encouraged by the commission to lower rates for everyone!

Thank you for your time.

Rex & Betty Woodward  
2008 E 4800 S  
Franklin, ID 83237  
208-705-7413