

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

From: PUCWeb Notification <Do.Not.Reply@puc.idaho.gov>

Sent: Wednesday, April 26, 2023 5:00 PM

To: Jan Noriyuki <jan.noriyuki@puc.idaho.gov>

Subject: Notice: A comment was submitted to PUCWeb

The following comment was submitted via PUCWeb:

Name: Logan Haglund

Submission Time: Apr 26 2023 4:19PM

Email: lmh@hasattorneys.com

Telephone: 208-821-0431

Address: 5252 Lindee Lane

Ammon, ID 83401

Name of Utility Company: Rocky Mountain Power

Case ID: PAC-E-22-15

Comment: "I would like to thank Rocky Mountain Power for providing their most recent response. What has been clear throughout RMP's efforts is that there has been a veiled attempt to recoup revenue lost when individuals make energy saving decisions. In particular, it appears as though this rate change is a concerted effort to recoup costs against those individuals who have have a net negative energy consumption/production. Thankfully, RMP's April 25, 2023, Reply removes that guise and allows the public to see RMP's true intentions.

As homeowners continue to find ways to go "green" in an effort to lower their energy consumption and bills, it is of course entirely logical that an energy company needs to find an alternative pay structure to maintain revenue. RMP has essentially skirted responding to this in all of its filings until its most recent Reply, at which point it unabashedly stated that "[e]lectric prices are subject to change and gradually increasing the fixed monthly charge fairly assigns solar customers for the cost of the grid upon which they depend." However, the issue here is not simply the increase in fixed monthly charges, but the coinciding reduction in kWh rates. RMP has strategically chosen to combine a flat rate increase with a reduction on kWh rates under the guise of "revenue neutral." The issue here is that RMP is not simply suggesting solar users pay their fair share, they are coupling a flat rate increase with a devaluation of electricity that solar users return to the grid.

Perhaps the most concerning statement made by RMP comes when it compares the struggles of residential users to implement green energy with RMP's own costs to maintain the power grid. Such a comparison is nonsensical as RMP is a multimillion dollar company with annual earnings in excess of \$100mil. Rather than encourage investment into green energy, such as solar, RMP appears to be more concerned with protecting those annual earnings and disincentivizing residential customers from going green. I encourage the Commission to see RMP's Application for what it is, a blatant attempt to claw back funds from customers who have invested in green renewable energy."

<https://puc.intranet.idaho.gov/apps/intranet/Comment> [Opens the PUC Intranet application]

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

From: PUCWeb Notification <Do.Not.Reply@puc.idaho.gov>

Sent: Thursday, April 27, 2023 11:00 AM

To: Jan Noriyuki <jan.noriyuki@puc.idaho.gov>

Subject: Notice: A comment was submitted to PUCWeb

The following comment was submitted via PUCWeb:

Name: Russell Daines

Submission Time: Apr 27 2023 10:44AM

Email: dainesru@gmail.com

Telephone: 208-206-2271

Address: 270 Baldwin Dr

Rexburg, ID 83440

Name of Utility Company: Rocky Mountain Power

Case ID: PAC-E-22-15

Comment: "I am opposed to the proposal to "modernize residential rates", Case No. PAC-E-22-15. Rocky Mountain Power's contention is that the new rate structure more fairly distribute fixed costs among customers.

I feel this ignores two issues.

First, there has not been a major shift in costs to Rocky Mountain Power. Electricity generation costs have not suddenly dropped by a factor of 2 or 3, making fixed costs a greater fraction of the total cost. From what I understand, nationwide energy costs per kWh have been increasing. This means that for many years, Rocky Mountain Power has been satisfied with the current rate structure in spite of the level of fixed costs built into it. I don't see a pressing need to make a change now.

Second, Idaho has one of the lowest per kWh electricity costs in the nation. Although that is partly because of the relatively lower cost of generation for this region, it also means that the current rate structure is likely shared by most utilities across the country. (If Rocky Mountain Power charged significantly more than other utilities on a per kWh basis, that might indicate their rate structure was different from other utilities.) I don't feel like Idaho should treat electricity costs differently from the nationwide public utility standard.

I feel the new rate structure will hurt the most economically vulnerable in the state.

The poorest residents of the state live in some of the smallest housing units and use the least electricity. Two online sites that I looked at indicated that someone in Idaho living in a 1000 ft.² townhouse apartment would probably use about 500 kWh per month. With the new rate structure, by the time it is completely phased in, they will be paying an extra \$150 a year. For people in this financial situation, \$150 per year could be somewhat significant. On the other hand, a family living in a 4000 ft.² house would typically use about 1800 kWh per month. With the new rate structure, they would save \$250 per year. For people in their economic situation, the extra \$250 per year is probably far less significant than the extra \$150 per year that someone renting an apartment would experience.

Finally, one additional point. This new rate structure significantly discourages adoption of solar. I own solar panels, and when I bought them, I calculated a payoff time of a little over 12 years. Recalculating with the new rate structure, the payback time is over 18 years. This is significant. If we want to encourage residents to get solar, the pay back time needs to be kept as short as possible. When it starts approaching 20 years, that is a major detriment to adopting solar.

Thank you for considering my comments."

<https://puc.intranet.idaho.gov/apps/intranet/Comment> [Opens the PUC Intranet application]
