

*✓ To AV.
for Int. Parkie
List ✓ Gen Ark
sent 5/13/02*

Jean Jewell

From: Ed Howell
Sent: Friday, May 10, 2002 5:51 PM
To: Jean Jewell; Ed Howell; Gene Fadness; Tonya Clark
Subject: Comment acknowledgement

WWW Form Submission:

Friday, May 10, 2002
4:51:28 PM

Case: IPC-E-02-04
Name: Kristy Webb
Street Address: 2158 Addison Ave. E.
City: Twin Falls
State: Idaho
ZIP: 83301
Home Telephone: (208)733-1769
E-Mail: crw@magiclink.com
Company: Idaho Power
mailing_list_yes_no: yes
Comment_description:

Idaho Rural Council

P. O. Box 118
Bliss, Idaho 83314

Idaho Public Utility Commission
via e-mail

Re: Comments on Idaho Power Company's Net Metering Tariff
Case Number IPC-E-02-04

Dear Commissioners:

The Idaho Rural Council supports net metering. We believe that it is an investment in Idaho's future and an important first step in developing renewable energy. It also encourages distributed generation. We believe renewable energy and distributed generation have important energy, economic and environmental benefits for Idaho.

Unfortunately, Idaho Power Company's Proposed Net Metering Tariff falls seriously short of providing Idaho and its customers the full benefits of net metering.

Idaho Power's proposal discriminates against irrigators.

Idaho Power's proposal would give small commercial and residential customers credit for energy generated and provided to the company for an indefinite period of time (an indefinite carryover).

Idaho Power's proposal would give irrigators credit for energy generated and provided to the company only for the month it was produced (a monthly billing period for irrigators). Irrigators will be paid for energy in excess of the power consumed in a particular month at 85% of the market price for non-firm energy in the Pacific Northwest - a small fraction of what irrigators pay Idaho Power for the energy they use.

The proposal is particularly disadvantageous for irrigators because they will probably produce power primarily in months they do not irrigate.

The Idaho Rural Council recommends that Idaho Power's net metering tariff for irrigators use either: 1) the indefinite carryover Idaho Power had proposed for small commercial and residential customers or 2) an annual billing period.

Idaho Power's proposal discriminates against wind power.

Idaho Power's proposal allows net metering on electrical generators with a name plate capacity of no more than 100kW.

Idaho Power's small name plate capacity proposal precludes most efficient wild turbines. The proposal discourages the use of wind power for net metering.

The Idaho Rural Council recommends that Idaho Power's net metering tariff allow generators with a name plate capacity of 300kW. This will allow customers to use small, but efficient wind turbines.

Idaho Power's proposal should include fair and consistent interconnection standards

The absence of clear, consistent, and fair interconnection standards will discourage customers from availing themselves of net metering. Customers need to know what it interconnection will cost when deciding whether to generate power for net metering. Clear and consistent interconnection standards assures customers of nondiscriminatory access to the net metering tariff. Clear and consistent interconnection standards would also give the Commission a better opportunity to estimate how many customers can realistically participate in net metering.

The Idaho Rural Council does not have the expertise necessary to suggest detailed interconnection standards. We believe that the Commission should require Idaho Power Company to prepare these standards. The proposed standards can then be submitted to the Commission and the public for comment.

A clear, consistent and fair set of interconnection standards are essential to a successful net metering program.

Conclusion

A strong net metering tariff from Idaho Power Company would encourage renewable energy and distributed energy production in Idaho. Unfortunately, Idaho Power Company's proposal falls far short of taking advantage of the potential for net metering in Idaho. We encourage the Idaho Public Utility Commission to require Idaho Power to amend its net metering tariff to more fully realize the potential of net metering.

Thank you for considering our comments.

Kristy Webb
President, Idaho Rural Council

Transaction ID: 5101651.28
Referred by: <http://www.puc.state.id.us/scripts/polyform.dll/ipuc>
User Address: 67.234.149.90
User Hostname: 67.234.149.90

✓ To AV. for Int Parties list
✓ Ken Beck sent 5/7/02

Jean Jewell

From: Ed Howell
Sent: Monday, May 06, 2002 11:47 AM
To: Jean Jewell; Ed Howell; Gene Fadness; Tonya Clark
Subject: Comment acknowledgement

WWW Form Submission:

Monday, May 06, 2002
10:47:09 AM

Case: IPC-E-02-04
Name: Bill Chisholm, IRC Energy Coordinator
Street Address: 19073E Hwy 30
City: Buhl
State: Idaho
ZIP: 83316
Home Telephone: 208-543-4418
E-Mail: chisholm3@mindspring.com
Company: Idaho Power Company
mailing_list_yes_no: yes
Comment_description: May 6, 2002

Bill Chisholm, Energy Coordinator
Idaho Rural Council
19073E Hwy 30
Buhl, Idaho 83316

Idaho Public Utilities Commission
472 Washington St.
Boise, Idaho 83720

Comments: IPC-E-02-04

While the Idaho Rural Council is encouraged by the expanded net metering opportunities being offered to all classes of customers by this filing; we are deeply concerned with the 2.9 Mega watt limit being imposed. Net metering presents an opportunity for Idaho Power customers to invest their energy dollars, not merely spend them. These investments are not merely economic investment opportunities, but environmental and security investment opportunities as well.

Albert Einstein said, "We cannot solve our problems at the same level of thinking at which we created them." The recent energy crisis and future energy crises will come about because we have failed to change our level of thinking, to invest in solutions. It is going to take some time to get up to speed, to make net metering a viable reality, but while that is true setting our sights so low at the 2.9 Mega watt level, which could be eaten up by big operators before the infrastructure is in place to make it more available to residential, small business and smaller agricultural operations would discourage participation. We therefore urge the Idaho Public Utilities Commission to set the net metering limit, if a limit is even needed at 10% of Idaho Power's load. We need to encourage, not discourage distributed electrical production along with conservation and energy efficiency. That is the kind of thinking that will prevent future energy crisis and the kind of socio-economic and environmental upheaval that we have recently experienced.

Submitted by,
Bill Chisholm
Energy Coordinator
Idaho Rural Council

Transaction ID: 561047.9
Referred by: <http://www.puc.state.id.us/scripts/polyform.dll/ipuc>

Ack. sent
5/9/02

Jean Jewell

From: Ed Howell
Sent: Thursday, May 09, 2002 11:56 AM
To: Jean Jewell; Ed Howell; Gene Fadness; Tonya Clark
Subject: Comment acknowledgement

WWW Form Submission:

Thursday, May 09, 2002
10:55:30 AM

Case: IPC-E-02-04
Name: Bill Chisholm, IRC-Energy Coordinator
Street Address: 19073E Hwy 30
City: Buhl
State: Idaho
ZIP: 83316
Home Telephone: 208-543-4418
E-Mail: chisholm#@mindspring.com
Company: Idaho Power Company
mailing_list_yes_no: yes
Comment_description: May 9, 2002

Bill Chisholm
Energy Coordinator
Idaho Rural Council
19073E Hwy 30
Buhl, Idaho 83316

Idaho Public Utilities Commission
P.O. Box 83720
Boise, Idaho 83720-0074

Additional Comments: IPC-E-02-04

These additional comments expand the previous comments submitted by the Idaho Rural Council on this matter. Net metering does not only present an opportunity for the individual customer to benefit by the investment of their energy dollars in a renewable net metering project; all Idaho Power rate payers benefit by the stability and sustainability that will come about with a more diverse and distributed renewable energy production base.

In addition to the previous comments regarding the 2.9 Mega-watt cap suggested by Idaho Power, which we believe should be raised to 10% of their projected needs, we believe that in order to move net metering along, individual cap sizes, particularly for agricultural projects should be raised as well. Net metering projects need to have the economic incentives in them that encourage investment. So for irrigators the cap should be raised from 100kw to 300kw and put on an annual, rather than a monthly true up. (See the attached work sheet)

We appreciate the opportunity to be a part of this process.

Sincerely,
Bill Chisholm
Energy Coordinator
Idaho Rural Council

Calculation of Needed Wind Capacity to balance annual power costs
under Idaho Power's net metering proposal for irrigation

Enter your specific information in the blue cells

Annual Power Cost

Irrigation Pump Horsepower 100
Operating time hour / year 2,000
kWh used by Irrigation Pump 165,778
Number of months of operation 6
Customer charge per meter per month/ in season \$10.07
Customer charge per meter per month/ out of season \$2.50
Demand Charge \$ / kW in season \$3.58
Annual customer charge \$75
Pump startup excess power use during system startup 25%
Billed demand kW 104
Monthly demand charge \$371
Annual demand charge \$2,226
In season energy rate \$0.045657
Annual energy charge \$7,569
Total Power Bill \$9,794

Annual Power Sales

Percent of power generated that is net metered 12%
Percent of power sold at 85% of Mid C rate 88%
Sales price net metered \$0.045657
Mid Columbia rate \$0.021
Average sales price per kWh \$0.023959
Number of kWh needed to be generated to balance bill 408,805
Wind capacity factor % 15%
Average hours at rated capacity 1,314
Size of turbine needed kW 311
Dollars of income from power generation \$9,794

Transaction ID: 591055.30

Referred by: <http://www.puc.state.id.us/scripts/polyform.dll/ipuc>

User Address: 67.234.149.98

User Hostname: 67.234.149.98

*✓ To A.V. for
Int. Parties List*
*✓ Gen Ack
sent 5/7/02*

Jean Jewell

From: Ed Howell
Sent: Monday, May 06, 2002 3:56 PM
To: Jean Jewell; Ed Howell; Gene Fadness; Tonya Clark
Subject: Comment acknowledgement

WWW Form Submission:

Monday, May 06, 2002
2:56:20 PM

Case: IPC-E-02-04
Name: Dan Hennis
Street Address: 2792 Desert Wind RD
City: Mtn. Home
State: Idaho
ZIP: 83647-5020
Home Telephone: (208)796-2747
E-Mail: D.M.Hennis@juno.com
Company:

mailing_list_yes_no: yes

Comment_description: Comments for Net-Metering

In "the real world"

- 1) I agree with the comment made that, "Wind power is no more non-firm than hydro" in that in our day-and-age our Met. people do quite well at forecasting both short and long range trends, (El Nino & La Nina).
- 2) We really don't have any State approved definitions of wind farms, sizes, registrations, (USDA or?), expectations, etc.
- 3) I join with the hundreds of people who have come to my little farm, to ask that wind power not just be allowed in Idaho, but be strongly encouraged through either realistic Renewables Portfolio or state production tax credits that match federal production tax credits. A Quarter or a Dollar a month is well worth it to have clean, cheap power, with hydro put into more reserves. At the risk of sounding like a Democrat, perhaps a tax of that amount could go to a grant/ loan program to help foster wind power projects in Idaho. I know I would jump at a chance to get a low-interest State grant/ loan to purchase turbines. Perhaps the program could be similar to the money Oregon has lent out to help the intermediate and large net-meterers to get started. In just one year, we could be well on our way to as much as 5Mw of wind projects across southern Idaho alone. Just think of the added revenues that would be gained in state with a few intermediate wind plants being installed and if out dams were full. Fish and wild life would prosper and recreation would boom as well as increasing development on a stable healthy scale. In full view of our entire State energy plan, it is a "must" to marry wind and hydro. Winds are best in the spring and fall whereas, Hydro is best used in summer and winter, with reserves for those rare windless anomalies. It is common knowledge that hydro plants work far more efficiently at a fuller level. This is not "eye wash," these are facts!
- 4) I ask again, why is one of our most valuable State offices shoved into the corner of a related office and stunted from being able to take the action that is needed?!? In other words, why isn't there a "State Department of (Renewable) Energy," instead of an after-thought office in the IDWR?!? Isn't Idaho's Energy Resources important enough to warrant an office with the power to help Idaho's power needs?!?!
- 5) I wish to stress the need to correct the present misconception about outputs VS surplus. To make a Net-Metering law that is based on outputs alone is asinine to say the least. A law should, where possible, be positive in intent. The current agreement in Net-Metering to govern by placarded output is grossly in error. This action is counter-productive and will foster lying and deceit in this new and growing industry in my opinion. If people are to embrace the Idea of wind power, it must make reasonable sense and, not be a burden or financially impractical. In order to meet their needs, small - intermediate wind farmers will begin to do things like "velcro placarding" to survive and

make this work for them. This is not only dangerous, but will cause a feeling of mistrust even greater than is now experienced between the utility and the wind farmer. I implore you to take the affirmative action to demand that caps be set at a reasonable level and governed primarily on surplus output and not by the placard alone. These caps need to be realistic to work. In this industry, there are many provisions to regulate the output of these mills by shunt regulator or diversion regulator besides the common output regulators. To overlook the use and existence of these controls is like making cars with no brakes. Their sizes would be unfairly stunted to render them useless in a horse-dominated world.

6) It has been my professional experience over the last 3 years that the 25Kw cap is only marginally acceptable in only the most ideal conditions. Since we must 3X to 4X size the turbines in most areas to approach a break-even point, the next available size of turbine is the 65Kw units, (for small scale), and 250Kw, (for larger farms). Therefore, for Net-Metering to work for the masses, it must be set at a realistic level for the winds we receive. This could and should be the logic in setting the upper cap also. As I stated in the meeting, an Ag farmer with a 400MwH/year load, will need to install at least 200Kw of turbines. I seem to remember some kind of cap of 2.9Mw. This will be reached with only 15 farmers in the entire state! A 5MW cap could be reached with only 25 farmers! Perhaps a more realistic "real world" cap should be more like 300 to 400Mw. I know of more than a dozen farmers in just two counties that wish to Net-Meter if they could be governed on surplus not placarded output. There are some 17 to 25 counties across Southern Idaho that could take advantage of this option if the caps and regulations were realistic. This one option alone, would free up vast quantities of present demand on hydro resources, allowing farmers to grow more and better crops as well as allowing the rest of the state to progress without the pressure of skyrocketing power prices. This is not to mention the many other benefits too lengthy to state here. Like my analogy, please do not staple our hands to our feet and expect everybody to work faster.

7) Please consider that our State has NO incentives, funding, or other financial assistance of consequence focused at harvesting the vast wind resource. With the third best wind in the west, you would think we would be at least the third MOST AGGRESSIVE STATE and not the LAST!!! When the Islands and third world countries shine over us at a rate exceeding 5 to 1, I get ashamed of the lax efforts made in my government.

Sorry, I did not want to say it so coldly. I had promised to not "hammer " you guys, but this is how I feel and how outsiders see Idaho.

Transaction ID: 561456.20

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User Hostname: 67.250.133.207

*Gen Ack
sent 5/9/02*

IPC-E-02-04

Jean Jewell

From: Ed Howell
Sent: Wednesday, May 08, 2002 8:54 PM
To: Jean Jewell; Ed Howell; Gene Fadness; Tonya Clark
Subject: Comment acknowledgement

WWW Form Submission:

Wednesday, May 08, 2002
7:54:21 PM

Case:

Name: Maureen Boling
Street Address: 401 Brooks
City: Hazelton
State: ID
ZIP: 83335
Home Telephone:
E-Mail: baubo@homeinternet.net
Company: ID Power

Comment_description: Please approve net metering and make it as accessible as possible so that more individuals and businesses can participate.

Thanks,
Maureen Boling

Transaction ID: 581954.21
Referred by: <http://www.puc.state.id.us/scripts/polyform.dll/ipuc>
User Address: 216.222.12.52
User Hostname: 216.222.12.52