

Idaho Public Utilities Commission
P.O.Box 83720
Boise, ID 83720-0074
Fax: 334-3762

RECEIVED

2013 JUL 11 AM 8:26

IDAHO PUBLIC
UTILITIES COMMISSION

Gary L. Iverson, Sr.
1227 E. Maine Ave.
Nampa, Idaho, 83686
Ph: 208-467-9264

10 July 2013

SUBJECT: Opposing IPC's proposal to modify the "Net Metering Service" contracts, and reconsideration of errors made by current IPUC Order NO. 32846.

Dear Sirs,

I would like to submit this response as provided for on page 20 of your "Order NO. 32846" as a Petition for Reconsideration. This order was received by me on 09 July 2013, and this reply will be within the 21 day time period to do so.

I would like to state that in my professional and reasoned opinion, that the arbitrary action of the IPUC in disregarding the well researched and thought out responses of not only the public, but even their own staff in regards to allowing removal of a real value placed on kW hours credited to small producers was a serious error on the part of the board. Beyond that, it was also a serious failure of this board to correctly and honestly represent the State of Idaho and it's people!

Taking the arbitrary words of the board, written in the Order NO. 32846, I found numerous onerous and erroneous arbitrary concepts, ideas, bias towards the Company side, and they have mis-applied or completely ignored the intentions of the Idaho Energy Plan going back for over 10 years..... this all is clearly seen in their words. Examples from just one decision as written:.....

1. Page 15 of the Order: "Commission Decision: Based on our review....., we find it fair, just and reasonable for the Company to compensate net metering customers..... using a kWh credit instead of a financial credit or payment."

Comment: This arbitrary statement shows a complete bias towards the Company and they even ignore their own wise staff recommendations in this matter. It is wrong. It is pandering to the Company without due cause nor true reasoned thought, and fails the State of Idaho and it's people. It will further weaken the future of all solar in general in the State of Idaho as a result.

2. Page 15 of the Order: "Commission Decision: continued....."While we want to encourage net metering, we believe that financial credit or payment may incent potential net metering customers to overbuild their systems."

Comment: This demonstrates a complete attitude bias against net metering in reality. This supports the idea of their arbitrariness in this decision citing "over building" as a supposed reason to ignore the input of all others. There has never been a true or real concern of over building in solar. This FACT goes clear back to the beginnings of the Idaho Energy Plans for over a decade. Our Energy Plan has been to do all we can as a State (to begin) to attempt to produce as much non-polluting and non-water using clean renewable energy as we possibly can. This was also reflected in the most recent past printings of the Idaho Solar Initiative which cited as it's goal as being "5000 Solar Roofs for Idaho" and it never once mentions that anyone might have to worry about some fake "over building, right-sizing or gaming" of their home system as cited by the IPUC.

FACT: To achieve anything close to a zero emissions, fully renewable, home power source, one MUST produce a bit more than they themselves will use. Then, the extra power is used to pay for the other non-renewables that we presently cannot do without: things like natural gas for water heat and oil and gasoline for our cars to get to work. “Over building or right-sizing” when it comes to solar, net metering, and renewables in general is a fictional word gimmick now used by our own IPUC against Idaho’s citizens who have been trying to do their part to not pollute and to support Idaho’s Clean Air initiatives. This too was also a gross failure of this sitting board to correctly and honestly represent the State of Idaho and the interests of it’s people!

3. Page 15 of the Order: “Commission Decision: continued.....”We believe that removing the cash payment takes away this gaming opportunity and encourages customers to right-size their systems.”

Comment: This foolishness clearly demonstrates their own personal biases towards the Company, and once again arbitrarily ignores all others whose knowledge and wisdom exceeds their own. The gaming done was through them on the behalf of the Company..... the entire Company proposal, considered all together, was so “out in the nether realms” to begin with, that the Company could never have thought to get this through. Their only real plan must have ask for 10 get two? This current plan is an outright theft of real value from all those who have invested and followed the “5000 Idaho Solar Roofs Initiative” in good faith! Corruption at it’s best.

4. Page 15 of the Order: “Commission Decision: continued.....”Further, we find it fair, just, and reasonable for the kWh credit to indefinitely carry forward to offset future bills for so long as the customer remains on the net metering service at the same generation site.”

Comment: They should have finished that sentence with these true words: “Then the Company will steal all that credit, take the value for themselves and for their shareholders, though they did not earn any nor pay for any of it.” That sort of evil, and planned collusion, to steal from producers is exactly the thing the IPUC Board is supposed to protect the people of Idaho from!

5. Page 15 of the Order: “Commission Decision: continued.....”Allowing the credits to carry forward..... ensures customers will be able to use their credits..... thus receive the benefits of their systems.”

Comment: Okay, some small credit to the board is due here..... though very small. At best, most solar is very expensive compared to hydro-electric dams, natural gas fired turbines, and such. With this being true, the most anyone could ever have hoped for was that the equipment might actually last for 20 years (much does not), and that after the 20 years is up that they might have produced enough energy to pay for the cost of that system. In this small short sentence the board acknowledges that we citizens have a right to expect to benefit from our system, that was most gracious of them under the circumstances I guess,..... but they by their overall arrogance and arbitrary decision making, have made sure that none of us will now actually ever break even.

In my opinion, this too was also a gross failure of this sitting board to correctly and honestly represent the State of Idaho and it’s people! Shame on them all!

To further support my position, I have below cited numerous **direct copied portions from the Idaho Energy Plan 2012**, and have added informational “Author’s comments” to each copied portion supporting my statements above:.....

Recommended Policies and Actions - Idaho Energy Plan 2012

Electricity RESOURCES Policies

1. The State of Idaho should enable robust development of a broad range of cost-effective energy efficiency and power generation resources within environmentally sound parameters.
2. Align legislative policies, regulatory policies, and state agency activity to consistently reinforce and support state objectives regarding energy efficiency, energy production, and delivery.
4. Encourage the development of customer-owned and community-owned renewable energy and combined heat and power facilities that meet the Energy Plan objectives of the State of Idaho. (Emphasis added.)

Author's Comment: The most recent actions of the IPUC Board violated the intent and direct stated plan to "encourage the development of customer owned renewable energy" which is not in any way limited to roof top or any other size..... IPUC actions have NEVER been in any plan as you will see later on below.....

E-4. Idaho's electric utilities should continue evaluating transmission as a resource option in resource planning and should continue participating in the development of local, sub-regional and regional, national, and international transmission plans to construct transmission facilities that are needed to provide reliable, low-cost energy service to their customers.

E-6 The State of Idaho should encourage technologies that minimize emissions, harmful pollutants, and consumptive use of water. (Emphasis added.)

Author's Comment: Note that we DO have some problems with our distribution system being undersized for the current and future loading..... any solar generation helps with this need right now! Also, from E-6, with the future of wind generation in question at times due to many various reasons, we are left with ONLY solar meeting every one of these state's objectives in the Plan. The current actions of the IPUC now put even this into question for the future in Idaho.

RENEWABLE GENERATION RESOURCES

Actions

E-7. Idaho should encourage cost-effective investment in renewable generation and combined heat and power facilities.

E-11. It is Idaho policy to encourage investment in customer-owned generation; therefore the Idaho PUC, utilities, municipalities, and cooperatives are encouraged to ensure non-discriminatory policies for interconnection and net metering.

***** AND below *****

Table 1.1. Facts About Energy in Idaho

52%	Share of Idaho's 2009 electric energy supply that was imported from out of state
38%	Share of Idaho's 2009 electricity fuel mix that came from coal-fired power plants
3.4%	Share of Idaho's 2009 electricity supply that came from non-hydro renewable energy sources
46.5%	Share of Idaho's 2020 electricity supply that is expected to come from non-hydro renewable energy sources based on 2011 Idaho utility resource plans
19th highest	Idaho's energy intensity as a share of the state economy compared to other states

Author's Comment: In E-11 and in table 1.1 we see WHY the State of Idaho's Energy Plan wants to encourage and NOT to discourage things like solar and net metering! Look how much of our energy is imported! Imported energy is expensive energy..... the 0.08% that goes to solar is a mere drop in the bucket, so why single it out for singular abuse? Notice that we only have 3% of our supply from non-hydro renewables..... that is ALL forms of non-hydro renewables..... no need to wonder why with the failure of the IPUC to protect the citizens of this state from a greedy Company and it's continued failure to support it actively. (The Energy Plan mandates such support.)

1.4.3. Recommended Policies and Actions

ELECTRICITY

Idaho citizens and businesses have benefitted from a stable, reliable and low-cost electricity supply and this Energy Plan does not recommend major changes to the structure of Idaho's electricity industry. At the same time, the Committee recognizes that investments in new generating resources are becoming increasingly challenging due to volatile fuel costs and increasing environmental concerns and that Idaho's current dependence on coal resources for nearly 40% of its electricity supply could leave the state vulnerable to potential carbon regulation. Enhancing energy conservation and efficiency measures and continuing to support the further development of cost-effective in-state renewable energy resources in order to reduce Idaho's dependence on imported coal-fired power are important aspects of Idaho policy.....

ENERGY EFFICIENCY AND CONSERVATION

The Committee finds that energy conservation and energy efficiency measures provide the greatest economic and environmental benefits for Idaho (and enhanced economic competitiveness for our businesses) and should be one of Idaho's highest priority energy resources and thus it is a major focus of the 2012 Idaho Energy Plan. The Committee believes that increasing investments in energy conservation is in order to reduce Idaho's dependence on out-of-state energy sources. (Emphasis added.)

NOTE from page 27 of the 2012 Idaho Energy plan.....

The state produces about 25 percent of the energy it consumes, as shown in Figure 2.3.22 Most of the energy produced in Idaho comes from hydroelectric dams. The state's reliance on energy from neighboring states indicates that infrastructure maintenance and development such as highway, rail, pipeline, and power lines are critical to support economic development. (Emphasis added.)

Author's Comment: We see here as fact, that Idaho only produces about 25% of our own States power and we NEED more: our demand is NOT decreasing over time either! Coal is one of the worst energy sources (if one can choose which to use), due to the high carbon emissions output. We should be doing all we reasonably can to support the one fully clean and renewable that we do have. One that seems to have zero negative impact anywhere or in any way: That one form is solar/ PV. The Idaho Energy Plans have all done that, but IPUC seems to have lost their vision and will.

2.3. IDAHO RESOURCES

Idaho currently has no commercial coal, oil or natural gas resource extraction operations (although natural gas exploration and test wells have been drilled and production is anticipated to begin in late 2011.) Idaho does have a variety of renewable resources available for potential development, including wind and small hydro power, geothermal, biomass, and solar energy. (Emphasis added.)

2.3.7. Solar IEP page 49

Solar energy is harnessed through a few different technologies. Solar Photovoltaic or PV systems convert sunlight to electricity. These systems may be small systems on individual homes and businesses or large central generating utility systems.

Southwest Idaho's solar potential is very similar to that of the desert southwest, which has the highest solar potential in the United States. This allows Idaho many opportunities for solar power applications; however, despite its excellent solar resource potential, Idaho is behind much of the rest of the country in solar installations. It is estimated that a total of 1 to 1.2 MW of solar PV is currently installed in Idaho. In 2010 alone, the Solar Energy Industry Association estimates 1,737 MW of PV were installed in the US.⁸² (Emphasis added.) (Q: WHY so little in Idaho?)

of 1 to 1.2 MW of solar PV is currently installed in Idaho. In 2010 alone, the Solar Energy Industry Association estimates 1,737 MW of PV were installed in the US.⁸² (Emphasis added.) (Q: WHY so little in Idaho?)

A few of the benefits of solar include utilization of an abundant Idaho resource, no greenhouse gas emissions, distributed generation, and potential for an additional manufacturing industry in the state. Though solar is an intermittent resource, its intermittency is consistent, and in general its production potential lines up well with high demand (mid-day). As control systems continue to improve, there is good likelihood for solar to play an important role. Cost is currently the major barrier to installation of photovoltaic (PV) systems, although the price of PV systems continues to decline rapidly, making wide-scale use of solar power for electricity generation less prohibitive.

Author's comment: Here you see that the Idaho State Energy Plan sees the distinct and clear value to Idaho and it's people of supporting and encouraging solar PV power, yet our IPUC has just further weakened any hope of a solar future for the State of Idaho with their arbitrary and biased move! By ignoring the people's will and the true unbiased input of their staff, I believe that they have clearly demonstrated that they have lost the will to govern rightly without bias, lost the vision of Idaho's future in clean renewable energy, and are not following the Idaho Energy Plan. This is particularly important when considering any future for Solar PV power.

2.4.6.....

Idaho's Conservation Program Funding Charge of 1.5% of customer electricity bills is collected and administered by Idaho's electric utilities following a 2002 ruling by the Idaho Public Utilities Commission. Idaho budgeted over \$50 million in 2010 to promote energy efficiency and load management (including residential and low-income programs) in the state through initiatives administered by Idaho utilities and the Northwest Energy Efficiency Alliance.¹⁰⁸

Author's comment: Here we are already - all of us paying - for this..... where is it going? Was it used wisely? How long did what we pay for last? Long term, did we actually accomplish anything at all? Even if there were to be found some small inequity in the current net metering plan, it is obviously a VERY small inequity that does not even come close to this amount of money taken from everyone by force of law. FACT. Give away \$50 million and cheat PV??

Distributed energy systems can include micro-turbines, photovoltaic installations, combined heat and power, biomass, wind, and gas turbines, and can be favored due to their relatively low-cost operation, small size, flexibility as well as many of distributed energy technologies being renewable in nature. These systems can be placed close to customer load, reducing or eliminating the need for transmission. In some cases a distributed generation unit can even be used as an alternative to connecting a customer to the grid. In addition, well chosen distributed generation locations can even reduce grid losses and can provide ancillary services which improve grid stability (such as reactive power, frequency and/or voltage control).¹⁸⁴ (quoted from page 94.) (Emphasis added.)

Author's comment: Please do note that there has NEVER been, in any of any of Idaho's Energy Plans a problem with size, over size, over-built, or any other arbitrary limit! The desire to reduce our energy dependence, import, and pollution is the overwhelming thought and intent..... what happened to this "vision" in the offices of the IPUC?? Where did this bologna about "right-size system & over built" come from? A lunch conference with the "Company"?

3.7.3. Environmental Impacts and Carbon Regulation²¹¹

Paragraph 2..... It is likely that global and national efforts to control CO₂ will impact Idaho's economy; both through energy pricing and our overall economic competitiveness. Idaho is among the nation's largest per capita energy importing states and many of our energy imports come from coal-fired power plants that are most susceptible to carbon-based price increases. If pending regulations increase power production costs, utility regulators in states hosting the power production facilities may act to protect the consumers in their region. This could further increase the price of power sold on the open market.

Author's Comment: here we are in beautiful Idaho, yet, we as a state use so much carbon and air polluting sources of power that we are one of the nation's largest polluters per capita..... let's see if we can stop our non-polluting renewables all together, shall we? Our IPUC is doing very well right now to further the suppression of Solar Power.

From page 118, Idaho Energy Plan.....

Idaho could take actions to attempt to mitigate potential greenhouse gas emission regulations through:

2. Supporting development of additional low carbon resources such as geothermal, bioelectricity, wind, solar, distributed hydropower, and biomethane. (Emphasis added.)

Author's Comment: An honest question for thought, "How can Idaho actively support these non-polluting, renewable sources best, and what might that support be in the form of?"

In answering that, there is ONE thing for certain.... the current IPUC Board has proven that it just does not get it. These people are NOT helping. These people have failed the State of Idaho and it's people.

From page 120.....

E-11. It is Idaho policy to encourage investment in customer-owned generation, therefore the Idaho PUC, utilities, municipalities and cooperative utilities are encouraged to ensure non-discriminatory policies for interconnection and net metering.

The Committee finds that it is in Idaho's interest to encourage customer ownership of small-scale renewable generation such as wind, solar, or micro-hydro in addition to larger facilities that qualify for PURPA payments. Idaho's investor owned utilities have established interconnection and ,net metering' policies for these resources and Idaho's municipal and cooperative utilities have developed model policies through the Idaho Consumer-Owned Utilities Association. The Committee urges the PUC and Idaho utilities to review these policies to ensure that they encourage investment in small-scale renewable resources and to fully implement these policies as quickly as possible. (Emphasis added.)

CE-10. Idaho State Government will:

I. Demonstrate leadership by promoting cost-effective energy efficiency, energy efficient products, use of renewable energy, and fostering emerging technologies by increasing energy efficiency in State government;

iv. Work to identify and address barriers and disincentives to increased acquisition of energy conservation and efficiency; (Emphasis added.)

Author's Concluding Comments:

Idaho as a State, "Planned and Intended" that the IPUC would actively support all forms of BOTH large and small renewable energy which includes solar PV at private homes, etc. The recent IPUC actions do NOT fulfill this plan nor intent, but show a serious lack of understanding, intent, and compliance with the Idaho Plan in what they do in these areas. Their own words and actions are their judge. The current IPUC action in Order NO. 32846, on several other areas I did not cover..... words they have used that I did not even include in this, also demonstrate a complete disregard for the Idaho State Energy Plans past and present. In reality, ALL - in it's entirety - of the Idaho Power Company proposal beginning back with Order NO. 32715 should have been dismissed with prejudice as being unreasonable, over bearing, heavy handed, unfair, unequal, and against the State's Energy Plan..... but it was not. In fact, many of the most onerous of the intended newly proposed charges and monetary penalties were not only - NOT factually dismissed as being wrong..... and they were just simply evil wrong..... but were held off for now, and cleverly worded so that they could be brought back again for consideration but under a slightly different venue (where they could then quietly be slipped in when no one was looking).(?) This sort of thing is NOT and should never be, a function of our PUC! Please DO reconsider your present action in future intentions in this matter.



Gary L. Iverson, Sr.
Nampa, Idaho 83686