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Idaho Power Co.

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I acknowledge that this comment constitutes a public record under Idaho Code sec. 9-337(13)

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

24 July 2013

#### Request for Reconsideration of IPUC Order No. 32846

In the Commissions decision the words “fair, just and reasonable” are used to summarize decision elements based on the commissions’ review of information presented by the various Interveners, Idaho Power, and the public through meetings and comments submitted to case 12-27. “stable and not to be soon revisited” would be welcomed – but not likely- additional verbiage!

As a Net Metered Residence affected by this decision, I have the following concerns.

Net Metering Pricing Structure and Excess Net Energy. The Commissions decision roughly agrees with the “Rebuttal Testimony of Gregory W.Said dated 31 May 2013.

In summery this amounts to:

Pg 6. Idaho Power Co. does not recover its fixed costs of distribution etc.

because “PV” (DG) producers don’t purchase kWhs from IPCo

Pg 7. The intent of Net Metering is to only offset all or part of the customers individual energy needs.

Pg. 12. IPCo has evaluated Solar DG under its “IRP” process.

Pg. 13. We (some Net Metering Customers?) are receiving “free use of equipment and services”.

Pg. 14. “FERC” and “PURPA”!

As I understand the rate process, IPCo. proposes rates based in part on their power source mixes, seasonal power use patterns, time of day usage, and customer monthly usage – from power source down to user. This approach does not look at kWh production/values *from* the Net Metering generation source upward. For example, because I am not

interested in getting a monthly bill from IPCo., on an annual basis my system is (roughly) sized to provide about 800 kWhs of power (at roughly \$0.075/kWh) to offset \$62. (\$5.20/mo) worth of administrative costs. As shown on the IPCo. web site, this power and a large percentage of the summer power produced to offset night time use of IPCo. generation occurs during IPCo. "Peak Use" periods. (Info based on IPCo. solar array on their Boise office building). In addition to these 800 kWhs, my system produces enough power to offset a years worth of IPCo. night and short day light winter useage. I do have a Sky Stream 3.7 wind turbine which does complement, but can never replace-the PV system. As an estimate, maybe 60% of my annual power or 4-5,000 kWhs is produced during peak demand periods,. This power is fed back through my meter and sold to neighbors between my residence and the nearest substation. IPCo.s "Time of Day Plan" states that this power could be worth about \$0.12/kWh.or \$480.-600. which at some rate is billed by IPCo. to neighboring users. In turn, I receive \$300.-375. worth of credit to offset my night time or deficit kWh usage, and administrative costs. Any residual is shown as a credit on my bill.

The power line between our residence and the neighbors was paid for by myself (majority cost) and two other land owners. Based on experience, it seems reasonable to assume that the other residences and irrigators also paid for their line hookups. I'm not aware that IPCo. paid any of the actual local line construction cost. From the "bottom up", this seems to mean that IPCo. collects revenue for kWhs produced by Net Metering generators – at a cost to IPCo. of not much more than their administrative costs - during a large portion of the" Summer Peak Use" period.

Based on the above "concept" of bottom up Net Meter production, I don't understand:

Pg.6. How it can be shown that IPCo. does not receive compensation for Net Metering customers use of the "system". It appears that we are paying peak load rates for off peak load power supplied during non or low generation periods.

Pg. 7. Why the system cannot accommodate the use of excess power to offset Administration costs. It appears -based on the above- that I'm paying more than the existing \$5.20/month rate through the "peak-off peak" kWh value exchange. It also appears that customers who build up large summer kWh credits for winter usage are paying more than the off peak winter rate for each kWh used.

Pg.12. As a business it appears that IPCo. makes sound power acquisition decisions. Not seeing the value of "up feed" PV/DG generation should warrant further consideration. Looking at IPCo.s "Up Close" news releases for July 2<sup>nd</sup> and 3<sup>rd</sup>, one has to wonder what it would look like *if* the Company had access to 675 MW of solar generation instead of the same in wind power on the two peak demand days.

Pg.13. From a top down cost analysis, this might be true, but from the bottom up it's not supported. I'm guessing that very few (if any) Net Meter PV generated kWhs get to a IPCo. sub station! Yet, IPCo. collects revenue as though this power was produced and moved down through their system.

Pg.14. Thirty or more states have systems in place which provide "reasonable compensation" for excess net metered generation. If this is an issue with FERC, how are

the majority of other states getting away with it? Do they have special “enabling” legislation designed to foster or shield Net Metering generators?

Finally, why would any residential customer with a nameplate capacity around 7 kWhs - producing around 10,000 kWh/year (1-2,000kWh above total residential usage), attempt to meet the requirements of Schedules 86/84 and possibly 72?

As a less than 800 kWh/ month customer, attempting to pay all the IPCo. “side of meter” costs with excess power I would think that the “Company” would have studied PV system production values from the generation site upward for at least their average 1,050 kWh residential user. I am not interested, nor could I recoup my generation or hook up costs through excess generation. kWh production above actual site usage or above usage and administrative costs can be roughly controlled on site at what is viewed as an unnecessary loss of revenue to IPCo..

If clarification on any of the above is required, please contact me at either of the above Email address so that additional arrangements can be made.

Respectfully,  
Keith Woodworth