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IDAHO PUBLIC
UTILITIES COMMISSION

Idaho Public Utilities Commission
472 Washington Street
Boise, ID 83720-0074

Petition for Reconsideration
Case No. IPC-E-12-27
Order No. 32846

July 24 2013

Delivered via email to Jean Jewell [Jean.Jewell@puc.idaho.gov]

Issues for reconsideration:

1. I believe the PUC's decision was **erroneous** to advanced the date of IPC request to stop payments for excess power from January 2014 to October 1st 2013. As stated in Idaho Power's request IPC-E-12-27; "The Company is requesting authorization to implement this change at the beginning of each customer's January 2014 billing period." In none of the testimony of hearings was it requested that the proposed effective date be changed. Advancing the date to Oct. 1st will cause additional hardship to some Net Metering customers that have additional non-net meter services. These customers will have to expedite the process of rewiring into one meter.
2. I believe the Commissioners decision was **erroneous** in regards to not addressing the issue of customers be able to transfer kWh credits from one account to another. This would have been a fair and equitable way to accommodate Net Metering customers that have additional non-net meter services.
3. I believe the Commissioners decision was **erroneous** in stating that a net metering customer with excess kWh could use schedule 86 to receive financial credit for the excess power. As stated in order 32846 "Those wishing to be wholesale power providers should look to Schedule 86 as the vehicle for that type of transaction."

That statement is incorrect in several facts.

1. A customer taking service under net metering schedule 84 can't at the time have service under schedule 86 PPA on the same meter.
2. It would be impractical for a net metering customer to have a separate service under schedule 86 and the means to switch their generation system over to that service for only excess power after their consumption needs where met.

3. Schedule 86 is clearly not intended for very small generation such as 25kW or 100kW nameplate systems. The cost and time involved in establishing and maintaining a schedule 86 service exceeds the value of any excess power.

A fair and equitable solution would be to allow net metering customers the option to sign a PPA contract for excess power without the additional requirements of site certification by a licensed engineer or the requirement for a \$1M liability insurance policy. Another option would be to modify schedule 86 to accommodate this level of micro-generation.

Sincerely,
Scott Moore