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IDAHO PUBLIC  
UTILITIES COMMISSION

BEFORE THE  
IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF )  
IDAHO POWER COMPANY FOR )  
AUTHORITY TO MODIFY ITS NET )  
METERING SERVICE AND TO INCREASE )  
THE GENERATION CAPACITY LIMIT )  
\_\_\_\_\_ )  
CASE NO. IPC-E-12-27

DIRECT TESTIMONY OF DAWN MARIE CARDWELL

ON BEHALF OF

PIONEER POWER, LLC

May 10, 2013

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**I. Introduction and Overview**

**Q. Please state your name and address.**

**A.** My name is Dawn Marie Cardwell and I was hired by Pioneer Power, LLC as Project Manager for a net metering project.. My address is 962 N. Glen Aspen Way, Star, Idaho 83669. A copy of my resume is attached as Exhibit "401." I am testifying on behalf of Pioneer Power, LLC.

**Q. Please describe Pioneer Power.**

**A.** Pioneer Power, LLC works with clients seeking to provide services for renewable energy projects, both net metered and contracted applications. In this instance a 40kW wind turbine was installed as a net metered installation to offset electrical expenses associated with operating a 200 H.P. irrigation pump. This property is located on a 280 acre ranch in Oreana, Idaho and is owned and operated by John and Lorna Steiner. The pump is necessary for the haying operations on the ranch and is a significant expense to the entire ranching operations. The net metered turbine is part of the owner's efforts to provide an economical and environmentally desirable way in which to offset the cost of electricity required to operate this irrigation pump. The owners expect to generate approximately 75,000 kWh on an annual basis which will help offset 400,000 kWh of electrical consumption by the pump. To give you an idea of the nature of this project, I have attached a photograph of the facility as Exhibit 402.

**Q. What is the purpose of your testimony?**

**A.** I testify as to the impact of Idaho Power's proposed changes in the treatment of excess energy under the proposed changes to its net metering program.

**Q. Have you testified before a public utilities commission before?**

**A.** No. This is the first time I have been a witness before a public utilities commission.

1 **Q. Do you address any of the other issues in this case, such as rate design?**

2 **A.** No. Idaho Power's request to change rate design does not apply to the irrigation class.  
3 However the company's proposal to change the treatment of excess energy will apply to the  
4 irrigation class as well as all the other net metering customers.

5 **Q. What is your understanding of the changes Idaho Power is proposing in the way it**  
6 **treats excess energy?**

7 **A.** The Company is proposing to provide net meter customers with a kWh credit in the  
8 amount of excess energy. It will allow that credit to be applied against future bills until the end  
9 of the calendar year when any remaining excess credits will automatically expire. Currently  
10 excess energy is paid for by Idaho Power at the end of the year.

11 **Q. What is Pioneer Power's response to Idaho Power's excess credit proposal?**

12 **A.** I don't like the idea of excess credits expiring because those credits represent real energy  
13 that Idaho Power will likely use to serve other customers. In other words, it looks to me like  
14 Idaho Power is proposing to take property (in the form of electricity) generated by the owners of  
15 net metering projects and at the owners' expense without paying for it. I don't think that is fair.

16 **Q. Are there other problems with Idaho Power's proposal?**

17 **A.** The use of a calendar year, when combined with an expiration of the excess credits,  
18 essentially deprives Mr. Steiner of the benefits of being a net metering customer for the time  
19 frame between the end of the irrigation season and the end of the year. If he irrigates from April  
20 through August, all of his generation for the months of September through December will  
21 essentially be for naught and will be sold to Idaho Power's other ratepayers without his being  
22 paid for it.

1 **Q. If Idaho Power's proposal is adopted by the Commission, is there a fair way to**  
2 **structure the time period over which credits are accumulated and the date on which they**  
3 **expire?**

4 A. First off, I don't believe Idaho Power's proposal should be adopted, as I discuss further  
5 below. However, if my recommendation is not adopted there is a way to fix this problem.

6 **Q. Please explain.**

7 A. For irrigation net metering customers, have the year begin at the end of the irrigation  
8 season at the beginning of fall, say September first. That way they would be able to use the  
9 generation from all twelve months from September through August to offset some of their  
10 summer irrigation load.

11 **Q. How would you have this Commission address the other issue you raise with respect**  
12 **to giving electrical energy to Idaho Power without being compensated?**

13 A. I don't understand all the legal issues behind Idaho Power's excess credit proposal; they  
14 say that they won't be able to pay for excess credits without a contract. So, short of signing a  
15 contract, I believe the excess credits should be carried forward indefinitely as long as the  
16 customer is connected. That way we can keep our property and it is not taken from us without  
17 payment.

18 **Q. When you say "indefinitely" do you mean to say that excess credits can accumulate**  
19 **forever?**

20 A. Not necessarily. They would accumulate for future use as long as that particular  
21 customer is connected. Should a new customer take possession of the facility they would begin  
22 over as a new net meter customer.

1 **Q. What do you propose would happen to the excess credits when the customer moves**  
2 **or sells the facility associated with the net metering project?**

3 A. At that time the customer would sell the excess credits to Idaho Power at the then  
4 prevailing avoided cost rate.

5 **Q. I thought you said that you understood it to be Idaho Power's position that it cannot**  
6 **buy the excess credits without a contract. How do you reconcile that with your proposal to**  
7 **sell excess credits when the net metering customer moves away or otherwise stops being a**  
8 **net metering customer?**

9 A. I think there is an easy way to reconcile this problem. When a net metering customer  
10 decides to cease being a net metering customer then that customer enters into a one-time contract  
11 to sell any excess credits on a one time basis.

12 **Q. What rate would Idaho Power pay for those excess credits?**

13 A. The Company could use the then existing avoided cost rate published by the PUC.

14 **Q. As a developer of net metering projects, can you help the Commissioners**  
15 **understand the economic impact Idaho Power's application has had on your business?**

16 A. Yes, I would like to address the impact this has had on my business model in terms of the  
17 economic impact. I worked on this project from the beginning. One of the incentives for me to  
18 be involved with this project was that Pioneer Power, LLC and I discussed the potential of using  
19 this project as a sort of model project to work out the bugs and be able to show other farmers and  
20 ranchers the potential they may have to benefit from a solar or wind net meter property. If  
21 IPCo's application is approved as is, we have no reason to even approach others as it would  
22 obviously not be cost effective. IPCo's proposal not only hurts existing net metering customers,  
23 it hurts Idaho's economy and destroys "Green Jobs" such as mine.

1 **Q. Does this conclude your testimony?**

2 **A. Yes, it does.**

Dawn Marie Cardwell

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Experience

July 2008 - present

Pioneer Power, LLC - Owyhee County, Idaho

- Initial planning, production of documentation and submittals for Conditional Use Permit application for 40kW wind facility.
- Permitting and project management of construction phase thru commissioning.
- Management of application and submittals for Federal "1603 Grant in lieu of Tax Credit" program.

Western Dessert Energy - Owyhee County, Idaho

- Initial planning and coordination of documentation for Conditional Use Permit application for 5 MW wind facility.

Tumbleweed Windfarm - Elmore County, Idaho

- Initial planning and coordination of documentation for Conditional Use Permit application for 10 – 15 MW wind facility.
- Cost estimates and Financial Projections for 20 year Power Purchase Agreement.
- Research for Federal "1603 Grant in lieu of Tax Credit" program.
- Research, support for testimony for Idaho legislative renewable energy issues.

The Blackhawk Project, LLC – Boise, Idaho

- Project management and coordination.
- Computer layouts for CNC machining of prototype parts.
- Prototype materials procurement and manufacturing scheduling.
- Coordination of institutional collaborations with Idaho National Lab (INL) and the Center for Advanced Energy Studies (CAES), Boise State University and Syracuse University.
- Research on project development for manufacturing design engineering, certification processes, marketing and distribution.
- Idaho Department of Commerce grants application.
- Application to the Department of Energy collaboration with TBP, LLC, CAES and Syracuse University.
- Participation in renewable energy conferences, forums and working groups.

1978 - 2004

Architectural Experience

Includes participation in a full range of services, from design development stages to the implementation of contract documents, for projects ranging from single family dwellings to institutional facilities. The following is a partial list, arranged by type, to provide an overview of my experience and capabilities.

- Recreational / Commercial
  - Anchorage Clarion Hotel \_\_\_\_\_ Anchorage, AK.
  - Kirkwood Resort Clarion Hotel \_\_\_\_\_ Kirkwood, CA.
  - Del Webb Hotels, Marinas, Convention Centers and Support facilities on Lake Powell \_\_\_\_\_ Wahweap, Bullfrog, and Dangling Rope, AZ. and UT.
- Institutional Facilities
  - Administration Offices, Minimum Security, Idaho State Correctional Institution \_\_\_\_\_ Boise, ID.
  - Pendyne Remodel and Renovation, Medium Security, Idaho State Correctional Institution \_\_\_\_\_ Boise, ID.
  - Correctional Industries Facility, Medium Security, Idaho State Correctional Institution \_\_\_\_\_ Boise, ID.
  - Idaho Army National Guard Tank School and Training Facility at Gowen Field \_\_\_\_\_ Boise, ID.
  - Nampa Care Center Renovation \_\_\_\_\_ Nampa, ID.
  - The Peregrine Fund Research, Support Facilities and Interpretive Center \_\_\_\_\_ Boise, ID.
- Financial / Retail / Space Planning
  - Mountain Home Federal Credit Union – Mt. Home, ID.
  - Idaho Mountain Touring Towne Square Mall \_\_\_\_\_ Boise, ID.
  - Albertsons Food Centers \_\_\_\_\_ Boise, ID., Las Vegas, NV., Wenatchee, WA.

**Education**

- My education has been ongoing in nature. Years of higher education, with emphasis on design, engineering and architecture. Extensive informal education and work experience. This education and experiences have enabled me to gain a well-rounded knowledge in all areas of the construction industry and also qualify for the Professional Architectural Registration Examination, administered under the guidelines set forth by the National Council on Architectural Accreditation Board, and more recently, my work experience in the Renewable Energy Industry has greatly expanded my knowledge.

**References**

References available upon request.

**Summary of Qualifications**

- My experience began with entry level design and drafting and has expanded to include organizing project design teams, training and working with others, coordinating and communicating with building officials and governmental agencies, engineers, contractors, clients and their representatives, code reviews, specifications, bidding, estimating and job supervision as they relate to the building and renewable energy industries.



Thank you for taking the time to review this document. Please, feel free to contact me for any additional information you may require.

Sincerely,  
Dawn Marie Cardwell  
208-761-8658  
[dmarie@blackhawkwindenergy.com](mailto:dmarie@blackhawkwindenergy.com)

