

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

*IPC-E-12-27*

10 Dec 2012

SUBJECT: Opposing IPC's proposal to modify the "Net Metering Service" contracts.

Dear Sirs,

I attempted first to use the case comment or question form on line, but I could find no references to this action by IPC to use (ID. Power Co.), and when I tried to submit a question about it, the website failed and gave a white page saying that there was no such address, etc.

Last Friday I received from IPC a letter dated the 5<sup>th</sup> of Dec. about this subject. A superficial scan would cause one to think that what they are proposing here is merely a few good common sense ideas. However, a full review reveals that they are good with soft words and sophistry. They are instead proposing several things that are very bad for Idaho and also contradict the Idaho State 2012 Idaho Energy Plan. May I please offer a few specific comments and references to the afore mentioned Idaho State 2021 Energy plan? Thank you.

COMMENTS:

Idaho Power company has stated in this letter (attached copy for your ease of reference.) in which they in their first point make it sound as if they are doing a great thing by proposing more availability of net metering than presently allowed. This is actually patently false in that they are actually working here to make sure that they kill any possibility that anyone will ever want to do this in the future. It is a bit sneaky for superficially it sounds so reasonable. But, immediately in the very next point they demonstrate that they are planning to (even) reduce any credit given for any energy produced, AND, in the third point, they obviously plan to cheat anyone out of any power made above what they might personally use.

DETAIL: If this plan were to be accepted by the IPUC, notice please that in the third point they will then (after having already cut any credit given in point #2) not only renege on current promise to issue a check at the end of each year, but if there is any extra credit left, they will pocket it themselves. You really cannot get any lower than this proposal, but that has not actually been anything too new of a concept for IPC over the past decades in Idaho.

If the IPUC would like to discontinue completely the net metering program in Idaho I simply cannot recommend a better pathway to do just that than this one that is proposed by the IPC! This action is guaranteed to kill any further growth of the Solar PV in Idaho.

End page 1 of 3, plus attachments.

Example: I designed, built, and completed the installation of a rated 6 KW solar panel power installation at my home in Nampa Idaho on November of 2011 that cost me about \$46,000. In Idaho, such a system only outputs about 4.5 KW max. In the 13 to 14 months that it has been operational I have accumulated a credit of \$562.00 with IPC.

They have never sent a check to me for I have not formally requested one yet, and in this proposed plan, they propose to steal all this from me every December. Can you imagine how you would feel if you were in my place? On top of this, they have regularly disseminated their propaganda against anyone with a Net Metering System telling all their customers that they are being unfairly saddled with the costs of over priced power because of people like myself on Net Metering. It is basically untrue of course, but it has a very small portion of truth in it. When in the past they have had to buy power from the national power grid, we in Idaho have had to pay increased rates to reflect those much higher prices paid for outside power, and the prices we are credited for excess energy produced is marginally different, but only a very small margin, and the costs to produce this energy are very much higher than any they are able to produce on their own. As it is even now, it is very nearly impossible to ever hope to achieve a payback on any system: if the IPUC goes along with this plan, anyone would be completely discouraged from ever attempting any solar power installation - effectively killing the program. If I were the people pocketing the money for Idaho Power Company how could I ever get a better deal? I get to rake it in both ways: I have no costs - NO REAL COSTS - for this power, and anything extra I get to pocket it and sell it to other customers: a win, win, & win for Idaho Power Company only.

#### REFERENCES:

- (1) In the 2012 Idaho Energy Plan pages I would like to bring up page 9 at the top of the page for your review. Notice the very first paragraph: items # 3.(2) AND 4. "Encourage the development....." In my opinion as a professional in the field, this proposal will effectively cancel out this directive in the plan by discouraging any or all development of such production. This proposal contradicts the 2012 Idaho Energy Plan completely.
- (2) Center of the page, # E-3. ".....should ensure that their orders and actions are consistent with the policies and objectives listed....." The current proposal does the negative of all mentioned in that it will kill all growth of said renewable energies. I do know that if such a corrupt proposal had been in place before I had contemplated this system, I would NEVER have built it, and I am sure that I am not alone in this result.
- (3) Lower on the page, #E-6. "..... should encourage technologies that minimize emissions, and harmful pollutants, and consumptive use of water." What I (and others like myself) have done with the expenditure of significant money is to fully, 100% comply with the 2012 Idaho Energy Plan as described. Whereas, IPC has only come up with huge sources of further pollution to meet the growing demand for energy by adding more gas turbines (and coal) capabilities in direct contradiction to the stated Plan for 2012.

End page 2 of 3, plus attachments.

(4) Bottom area of the page 9, RENEWABLE GENERATION SOURCES.

#E-7, "Idaho should encourage....."

#E-8, "Idaho should encourage....."

As far as "encouraging" anything, this proposal by IPC is the exact opposite. They know all of this of course, but they have already spent a lot of time and money on propoganda to sell this proposal, even though it is against the basis of the Energy Plan for this state. For this, they deserve no encouragement, commendation, nor accolade.

(5) Page 48 of the Idaho Energy Plan 2012. 2.3.7 Solar

In this entire section from page 48 to the top paragraph on page 49 describes solar power in Idaho, it's potential for growth, it's many benefits to Idaho, and the fact that it is prevented from growing well right now by the fact that it is cost prohibitive at this time. They believe that it could play an important role in the future picture of Idaho's overall energy production. I concur with this, but it is also my conviction that if IPC is allowed by the IPUC to prevail that it may never contribute to Idaho in any way in the near future.... all killed by this proposal. It is a death-nell to the entire Idaho solar PV industry in my professional opinion. This "proposed plan" would be antithetical to the Idaho Energy Plan 2012.

There are more references that could be cited, but I think that this should provide more than enough information to help the IPUC to arrive at the conclusion that the current proposal is NOT compatible with the Idaho Energy Plan for 2012 or likely in any other year to come.

CONCLUSION: I would very much in closing refer you to the bottom of the page 1, from IPC, the last short paragraph on that page: "Because the proposed changes are intended to expand the availability of net metering service....."

My hope is that I have provided to you enough information in this short essay to confirm in your minds the blatant lie behind that statement above from their letter. IF the IPUC were to go along with this proposal the exact opposite would be guaranteed as a result. It is NOT making anything bigger, better, easier, nor less costly to anyone but themselves in this proposal. They would have zero investment, they would have zero upkeep costs, they would steal the output from the producers, and they would sell the stolen output to other customers, who would then pay them normal rates for all this free energy. Corporate greed in it's finest form! Plus, it is a guaranteed way to make sure the IPC never has to "deal with" Net Metering Services ever again in the future.

Sincerely yours,



Gary L. Iverson, Sr.  
1227 E. Maine Ave  
Nampa, ID 83686  
(208) 467-9264

Idaho State Master Journeyman Electrician  
Reply is requested. Thank you.

End page 3 of 3, plus attachments.



December 5, 2012

GARY L & DEE E IVERSON  
1227 E MAINE AVE  
NAMPA ID 83686-7278

Subject: Modification to Net Metering Service

Dear GARY L & DEE E IVERSON:

I am writing to let you know that on November 30, Idaho Power filed a proposal with the Idaho Public Utilities Commission (IPUC) requesting authority to modify its net metering service provisions to facilitate continued growth in the service availability. The filing requests authority to:

- Double the availability of net metering service from the current 2.9 megawatt (MW) cap to 5.8 MW
- Modify the pricing structure for net metering services provided to Residential Service and Small General Service customers through the implementation of new, proposed Schedules 6 and 8 in order to appropriately reflect the costs of providing net metering service to those customers
- Modify service provisions contained in Schedules 72, Interconnections to Non-Utility Generation and Schedule 84, Customer Energy Production Net Metering to improve clarity, and
- Eliminate the practice of providing financial payments to customers who generate more energy than they use. Instead, the company proposes to provide those customers with a kilowatt-hour credit in the amount of the excess energy generated during a billing period; this credit can be carried forward and applied against use in future billing periods. However, any kilowatt-hour credits remaining after the December billing period will expire and cannot be used.

Because the proposed changes are intended to expand the availability of net metering service, the rates of standard service customers (those not receiving net metering service) are not affected. Idaho Power currently has approximately 350 net metering customers that may be impacted by this proposal. Individual customer impacts will vary depending on how they use energy.



An IDACORP Company

Questions? Contact us at:
PO BOX 70, Boise, ID 83707.
Or call (208) 388-2323 (Treasure Valley).
Se habla español.
For faster service please call
Tuesday - Friday, 7:30 a.m. to 6:30 p.m.

Customer Name: GARY L & DEE E IVERSON
Account Number:
Billing Date: 12/04/2012
Print Date: 12/04/2012

www.idahopower.com

Table with 2 columns: Due Date (12/19/2012), Please Pay (\$0.00)

Account Activity

Table with 2 columns: Description, Amount. Rows include Previous Balance (\$563.78 CR), Payments - Thank You (\$0.00), Balance Forward (\$563.78 CR), Current Charges (\$0.94), and Account Balance (\$562.84 CR).

Please Note: Any unpaid balances will be assessed a monthly charge of one percent (1%) for Idaho customers. Any credit due to a rebilling will be applied to future billings or can be refunded upon customer request.



Consider joining Idaho Power in supporting Project Share, a valuable community service that uses voluntary contributions to assist individuals and families who need help paying their energy bills during the winter heating season.

Please detach and return the part on below with your payment. Please bring entire bill when paying at a pay station.



PO BOX 70
BOISE, ID 83707
(208) 388-2323 (Treasure Valley)

ACCOUNT NUMBER
DUE DATE 12/19/2012
PLEASE PAY \$0.00

Amount Enclosed \$

Project Share pledge, noted on reverse side.

Address/Phone Correction, noted on reverse side.



2003 1 AV 0.347
GARY L & DEE E IVERSON
1227 E MAINE AVE
NAMPA, ID 83686-7278

T201 00002903 10 2303



PROCESSING CENTER
P.O. BOX 34966
SEATTLE, WA 98124-1966

21894282778000056284 000056378 000000000 1204 9

**Jean Jewell**

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**From:** Ilana Rubel [IRubel@fenwick.com]  
**Sent:** Friday, December 07, 2012 6:16 PM  
**To:** Jean Jewell  
**Cc:** Lou Ann Westerfield; Wayne Hart  
**Subject:** Idaho Power's Net Metering rate increase request

*IPC-E-12-27*

Ms. Jewell, Ms. Westerfield, and Mr. Hart –

I am writing to express my extreme dismay at Idaho Power's November 30, 2012 letter to Commission Secretary Jean Jewell – it is an “under-the-radar” attempt to crush the budding solar industry in Idaho. Idaho Power has requested a more than 400% net meter monthly service increase, from \$5.00 to \$20.92 per month, or \$251.00 per year. Having recently installed solar panels on my own home, I was already flabbergasted by Idaho Power's insertion of obstacles at every turn. They delayed for months in coming to hook up my meter, then made up a number of flimsy pretexts as to why they couldn't do it. It took nearly three months to overcome Idaho Power's obstructive tactics – it was as if Idaho Power had issued explicit instructions to its personnel to do anything possible to stop consumers from being able to get meter credit for their solar power. If anything, something should be done to reign in Idaho Power's existing sabotage of consumer efforts to switch to renewable energy. But Idaho Power has stepped up its attacks on clean energy to a horrific new level with its latest gambit to quadruple rates for solar users. This is nothing but a naked attempt to kill alternative energy. At the proposed rates, many solar energy users will actually be charged more on their power bills than if they had no solar panels at all – a ridiculous outcome. The return on investment for solar energy will be so low under the proposed rate structure that no solar company will have a hope of staying in business (undoubtedly what Idaho Power hopes will be the result). The fact that Idaho Power is trying to sneak this through without public comment is also very telling, and should not be tolerated.

I would hope that you see your duty at the Public Utilities Commission as including the fostering of an environment in which sustainable energy providers can survive. Here, Idaho Power is attempting to leverage its monopoly power to price solar companies out of the market. At the hyper-inflated rates proposed by Idaho Power, consumers will be paying a severe penalty for using solar energy. This cannot be the incentive structure that your Commission seeks to promote – if anything you should be incentivizing conversion to solar and other renewable energy.

We in Idaho have a lot to lose in the face of climate change. Our ski industry is suffering terribly, our forests are burning up as shortened winters allow bark beetles to destroy our trees, and our air quality has been appalling this past year. The last thing we should be doing is punishing consumers that are willing to invest in solar to try to improve our environment. Please do not allow Idaho Power to abuse its monopoly status in this egregious manner.

Regards,  
Ilana Rubel

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## Jean Jewell

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**From:** js\_weber@hotmail.com  
**Sent:** Monday, December 10, 2012 2:41 AM  
**To:** Jean Jewell; Beverly Barker; Gene Fadness  
**Subject:** PUC Comment Form

A Comment from John Weber follows:

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Case Number: IPC-E-12-27  
Name: John Weber  
Address:  
City: Boise  
State: Idaho  
Zip:  
Daytime Telephone:  
Contact E-Mail: [js\\_weber@hotmail.com](mailto:js_weber@hotmail.com)  
Name of Utility Company: Idaho Power  
Acknowledge: acknowledge

Please describe your comment briefly:  
Dear PUC Commissioners and Staff,

After further review of the direct testimony of Matthew Larkin I have the following comments:

Page 19- Raising the service charge from \$5.00 to \$20.92 a month is prohibitively expensive and would make net metering uneconomical in most cases. The over 400% increase of \$15.92 cents is equivalent of 203 kWhs of production @ the current lowest summer rate of \$.078424. Annually this is 2,436 kWhs of production, which for solar PV is a system of 1,575 watts. At \$5.50 per installed watt this system would cost \$8,663.

Page 19- A BLC or Basic Load Capacity charge is a good idea and in fairness should be implemented for all ratepayers not just net metering customers.

Page 23- Time of use billing is possible with Idaho Power's new billing system paired with AMI meters. At least one Idaho Power employee has told me it would be available to net metering customers in 2013. Time of use net-metering is the most fair to Idaho Power, net metering customers and all other ratepayers as Peak Power is more expensive to generate than Off Peak Power. By using time of use billing, net metering generation would be valued closer to the true value of other generation sources at the time it is produced.

Page 27- Having kWh credits expire at the end of the December billing period would have different impacts on net metering customers that use different sources of renewable generation. Many of the sources are seasonal by nature. The fairest way for all ratepayers and the net metering customer is for the credits to continue until the service is disconnected or transferred to a new owner. I do agree that in principal the customer should not be paid for over production, only credited for the life of the customer's service.

Exhibit #1- Rates should be the same for all customers. Net metering customers should not pay a lower rate than other customers. Higher rates encourage conservation. The PUC has encouraged conservation in the past with the tiered rates. The State Energy Plan also encourages conservation. I believe the reason for conservation is to keep rates down by reducing the need to build new generation and transmission.

Additional notes:

Service charges, BLC charges, and rates should be the same for all customers. O & M costs should be based on usage as the costs vary with usage.

Net metering is good for all customer classes and ratepayers because it reduces the need for new generation, transmission, and the need to import electricity (or fuel for generation). Renewable generation installation creates Idaho jobs that can't be out sourced.

If Idaho Power's case were to be approved I can only imagine more customers will choose to leave the electrical grid entirely or relocate to a more net metering friendly utility. This would not be to the benefit of all ratepayers or the State of Idaho.

This once again reinforces my long standing avocation for the PUC and/or legislator to create a state wide net metering law.

Thank you for your consideration.

The form submitted on <http://www.puc.idaho.gov/forms/ipuc1/ipuc.html>  
IP address is 69.80.39.77

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