

To: Idaho Public Utilities Commission
PO Box 83720
Boise, ID 83720-0074

January 14, 2013

Case No: IPC-E-12-27
Name: Keith Woodworth
City: Caldwell
State: Idaho
Zip: 83607
Day time phone: (208) 402-4127
Name of Utility Company: Idaho Power
Public disclosure: Acknowledged

Proposal Comments

I have been an Idaho Power (IP) Net Metering customer with both a PV system and a Skystream 3.7 wind turbine since the summer and fall of 2008. To date, I have requested and received one payment for surplus KWs from Idaho Power. At my request, a buffer fund was retained by IP for costs not covered during any future billing period by on site production.

Based on records for the period of July 19, 2011 to July 19, 2012, my turbine produced 1,868 KWs, the PV system produced 5,059 KWs and the residence used 4,370 KWs. In turn, a surplus of 2,557 KWs were returned to Idaho Power which covered the monthly \$5.00 administrative costs, and contributed to both the buffer and refund amounts. Due to mechanical problems, the turbine has been "off line" enough to make comments based on annual production rates approximate BUT, it appears that 72% of the wind power production occurs between October and April and about 30% of the PV production occurs during the months of June, July and August. The system does supply power back to Idaho power during the summer peak rate period.

With a nameplate capacity of 4.940 (5.540 with Skystream @2.4?) my residential system falls under IP's proposed Schedule 6 as outlined in the testimony of Matthew T. Larkin of IP.

The following comments follow the outline presented by Mr. Larkin.

History: Staff concerns, P7,22-29, P8, 1-13. The likelihood of a residential system being "0" is remote. More than likely, the system has produced a KW surplus which was distributed and sold by IP at the time of production. As most residential systems are PV, any surplus produced offsets IP's dependence on higher cost "non-green" energy sources. This ignores any cost reduction associated with the voluntary IP "Green Credit" program.

Although the administrative cost is now \$5.00 instead of \$2.51, the original analysis does not appear to take into consideration (probably does but I can't see it) the net meter customers contribution to the grid during peak demand periods at the present rate of

\$0.0525 instead of the estimated \$0.12 cost associated with producing this power at a newly constructed facility. Presently, power costs from the gas fired New Plymouth facility may be lower - but, for how long?

P9, 14-20. I don't understand how the costs to serve net metering customers are significantly different from that of any other residential customer. We have the same lines, meters and at least in the past, the same use rate costs. With the new AMI (Smart Meters?) - the IP cost of service with proper management should decline. (note: our meters are not remotely readable yet)

P10, 9-15. Minor point but as a paying customer I question the 353 customer number. Once the economics of this proposal are evaluated by the "Applicants", I would think that at least some will reconsider their application status. As proposed, I know I would!

Capacity Limit: P11, Figure 1. The chart shows that there are roughly applications totaling 250 KWs of nameplate pending. Treating these "Applicants" as "Customers" would imply that they were notified of IPs pending proposed Net Metering service rates and requirements.

When proposing such a major change to the existing net metering costs, why would an increase in the capacity limit be requested or approved before the effects of any newly levied rates were evaluated?

Pricing: Not having access to IP's energy costs, this is beyond my review. My records show that I paid IP \$4,653.67 for a third of the cost to run an overhead power line to a point on adjacent property, then \$1,506.00 to run underground (trenching and backfilling were an additional cost) service to a transformer and meter on or adjacent to the residence. Unless I have missed something, that did put me on equal footing with the cost of providing service to any other IP residence customer. BUT, with my PV and wind unit, on a monthly basis I'm not generally buying power produced by IP. On a daily basis, I recognize that I am using IP produced power (no night or "dead air" power from an on-site battery storage system). As pointed out by several commenters, I am certainly producing "green KWs" [which are (sold at a profit?) sold by IP] back into the IP distribution system during peak demand use periods. It would also appear that my wind power is mainly produced during the winter period when IPs dam reservoirs are being recharged. That should be more of an asset than a liability to the IP system.

The IP proposal of \$20.00/ month to cover "administrative costs" which includes \$15.00 of "potential inequity(s)" (what ever they might be) is truly a green energy program "fatal blow" for customers having no intentions of being major (MW) energy generators.

Perhaps another approach to residential PV/wind units would be a simplified "admin" billing system. As an example, on January 1, each residential net metered account would have a deposit (an amount supported by site specific analysis). At 0:00 AM on June 1st, for \$20.00, IP would take a "Smart Meter" reading and calculate a bill/statement based on used/produced KWs. At this point the account deposit would be adjusted and IP would

send an accounting bill/statement showing the account balance. Again on August 31st at 12:00 PM/0:00 AM IP would again read the meter for another \$20.00, calculate and send a bill showing an adjusted account deposit. Finally on December 31st, IP would read the meter, then submit a bill to either maintain the account deposit or "Zero"-(cut a check)-for IP's side of the account after of course deducting the third \$20.00 admin cost. In this example, base load is not a consideration.

I don't know how the proposed charge of \$1.48 per KW of Base Load Capacity would affect me, but assuming that it is also in the "spirit" of the proposed \$20.00 per month administrative fee it could be harsh!

Excess Net Energy: IP's definition of "Excess Net Energy" provides a measure for accounting purposes but the measure as used by IP is not specific to any particular time of day. This goes back to PV panels producing KWs during high demand summer periods. On any given day IP would call these "excess" but in reality they should be viewed as "green" surplus being used to lower IP's use of what appears to be more expensive carbon based energy sources.

I find it difficult to believe that "FERC" could get really concerned over residential power generation probably measured at less than 1 or 2 MWs/year. On the contrary, in light of the nationwide "greening", I would imagine that they would be happy with a lot more small residential generation!

A "Google" search of Avista Corporation failed to show that this system of "Taking" KWs on December 31st is uniformly applied to Avista's customers. Avista customers in Washington (and Oregon?) are reimbursed on a July 1 – June 30 fiscal year basis. It is recognized that Idaho and possibly Oregon customers are not eligible for this "... Cost Recovery/Annual Incentive Payment..." program as the Washington State Department of Revenue is also a program player. Any idea what FERC's position on this existing payment program might be?

Final Comments: A partial list of the Idaho entities involved in my PV and Wind turbine project include: IP Company Permitting, Excavation Contractor, Alternate Energy Contractor, Canyon County Zoning & Planning, Canyon County Building Permit staff /Field Inspector, Canyon County Electrical Inspector, Idaho State certified Electrician, Idaho State Electrical Inspector, IP Field Inspector. Concrete, electrical cable, conduit, wood and locally acquired re-bar would make up most of the rest of the cost list. The possible effect of this proposal is far more extensive than just an agreement between a Net Metering Customer and IP!

Is "Base Load Capacity" a new billing item for all residential power customers or is it only proposed for Net Meter customers?

Respectfully,

Keith Woodworth

Jean Jewell

From: sabotjedi@q.com
Sent: Sunday, January 13, 2013 3:39 AM
To: Jean Jewell; Beverly Barker; Gene Fadness
Subject: PUC Comment Form

A Comment from Jim Avichouser follows:

Case Number: None available at this date? *IPC-E-12-27*
Name: Jim Avichouser
Address: 656 N. 9th Ave.
City: Pocatello
State: Idaho
Zip: 83201
Daytime Telephone: 2082323184
Contact E-Mail: sabotjedi@q.com
Name of Utility Company: Idaho Power Company
Acknowledge: acknowledge

Please describe your comment briefly:

I am opposed to any adjustments requested by Idaho Power concerning so called 'net monitoring' fees for small residential consumers who have installed solar or other production equipment that feeds excess production back into the general grid. The position by Idaho Power that small solar and others are avoiding 'fixed costs' by means of reimbursements for power produced is a red herring in that their excess power inputs are already providing Idaho Power with the benefit of offsetting those costs. I also oppose Idaho Power putting small producers on a separate tariff (higher rates) in order to punish them for seeking to diminish demand and supply excess during peak periods of demand. It is also ludicrous that they should suggest that power inputs be 'zeroed out' at the end of each calendar year as if residential producers are a nuisance in spite of yearly growth of their capabilities. Summer demands are especially enhanced by excess residential production. This effort by Idaho Power is a clear attempt to bar entry and to enhance an otherwise monopoly status at the expense of consumers who invest in the means to enhance Idaho Power's ability to meet demand.

The form submitted on <http://www.puc.idaho.gov/forms/ipuc1/ipuc.html>
IP address is 65.101.74.16

Jean Jewell

From: sabotjedi@q.com
Sent: Sunday, January 13, 2013 3:48 AM
To: Jean Jewell; Beverly Barker; Gene Fadness
Subject: PUC Comment Form

A Comment from Jim Avichouser follows:

Case Number: *IPC-E-12-27*
Name: Jim Avichouser
Address: 656 N. 9th Ave.
City: Pocatello
State: Idaho
Zip: 83201
Daytime Telephone: 2082323184
Contact E-Mail: sabotjedi@q.com
Name of Utility Company: Idaho Power Company
Acknowledge: acknowledge

Please describe your comment briefly:

As an addendum to my comments I further understand that Idaho Power is proposing to double the current cap on the numbers of customers who can participate in the net monitoring service but have requested the penalties for residential producers as part of the above noted request to double net monitoring cap. While part of the request gives the appearance of enhancing a program, the attendant requests serve to penalize small producers who have incurred personal expense already to enhance power availability. ROI considerations on the part of small producers are already constrictive and long term in nature. Idaho Power intends by this request to make entry into alternative power production as restrictive as possible. They hope to kill individual initiatives so that they can consolidate their hold on monopoly and keep all customers beholden to their fiat.

The form submitted on <http://www.puc.idaho.gov/forms/ipuc1/ipuc.html>
IP address is 65.101.74.16

Jean Jewell

From: mdunay@altenergyincorporated.com
Sent: Monday, January 14, 2013 3:01 AM
To: Jean Jewell; Beverly Barker; Gene Fadness
Subject: PUC Comment Form

A Comment from Matthew Dunay follows:

Case Number: IPC-E-12-27
Name: Matthew Dunay
Address:
City: Boise
State: Idaho
Zip: 83712
Daytime Telephone:
Contact E-Mail: mdunay@altenergyincorporated.com Name of Utility Company: Idaho Power
Acknowledge: acknowledge

Please describe your comment briefly:

I am opposed to case #IPC-E-12-27 and urge the PUC to reject the requested rate changes.

Idaho Power is proposing to:

- increase net metering customers monthly service charge by 400% -devalue the electricity net metering customer generate -take possession of excess electricity net metering customers produce without compensating the customers

How net metering systems currently benefit Idaho rate payers:

- net metering systems reduce the need for Idaho Power to build new expensive power plants - net metering systems (especially solar) produce their highest electrical output during peak demand periods -net metering systems reduce the need for Idaho Power to purchase expensive peak power from neighboring power utilities -net metering systems reduce the transmission losses on Idaho Power's grid -net metering systems reduce the amount of coal Idaho Power burns

How net metering customers should be compensated:

- Idaho Power should pay a premium for net metered electricity as is done by Electrical Utilities in Utah, Washington and Oregon.

Idaho Power was given a legalized monopoly to sell electricity to Idahoans. They are a for-profit corporation. Fairly compensating and encouraging the growth of net-metering customers will reduce all Idahoan's electrical bills by building a more efficient and cost effective electrical grid. These proposed Net Metering rate changes fail to accomplish these goals.

Matthew Dunay, NABCEP Certified
Altenergy Incorporated
Idaho Spec Electrical PV Journeyman #013090

The form submitted on <http://www.puc.idaho.gov/forms/ipuc1/ipuc.html>
IP address is 205.189.35.2
