

January 21, 2013

RECEIVED

Idaho Public Utilities Commission  
Attn: Jean D. Jewell, Secretary  
472 West Washington Street  
Boise, Idaho 83702

2013 JAN 28 PM 3: 29

IDAHO PUBLIC  
UTILITIES COMMISSION

RE: Case No. IPC-E-12-27  
Proposed Net Metering Changes

Dear Ms. Jewell:

We are one of Idaho Power's (IPC) small net metering customers that would seriously be affected by their recent petition request, which now is in front of IPUC. We are senior citizens living on a fixed income. We purchased our all-electric home in June 2010, and because of an energy audit we took dramatic steps to make our home more energy efficient. To further reduce our utility burden, by mid-October 2012 we had a solar system installed, and interconnected with IPC's system. Additionally, we keep our thermostat set for maximum energy effectiveness (winter 63-degrees & summer 78-degrees). We use high-efficiency light bulbs along with clock timers for our house lights and hot water heater. The lights simply go on when it is nighttime (winter 6PM – 10PM, summer 8:30PM – 10PM). The hot water thermostat is set at 120 degrees and goes on from 4PM until 10PM. We rarely use air-conditioning during the summer. In addition, we had extra insulation (5-ft) blown into our attic space, replaced leaking windows and installed thermo blinds on all the windows. Once again, all of these measures were done in an effort to reduce our utility burden. We take our own ecological footprint seriously, and we make every effort to reduce or eliminate all of our waste, which includes recycling.

If IPC's proposed changes are granted by the IPUC our utility costs will quadruple despite all of our cost saving efforts!! And then to add insult to injury, our solar credits would simply disappear precisely when we need them the most!! **We would be immensely penalized by having a solar system!!** When we went through great deal of expense for our small solar project with a total payback period of twenty-five years. We were informed by IPC that if they raised their standard rates, it would also be reflected in the solar energy repayment. Our motivation for the solar system was purely to reduce our electric utility burden, not to make money. **Then again, just giving our solar energy away to IPC for absolutely nothing also penalizes us for generating green power and defeats the entire purpose of the PURPA laws. Now, they want us to accept a credit system (use it or loose it) whereby, Idaho Power can eradicate those credits at will, which is totally unfair, irresponsible and unethical!! As a result, all net metering customers would subsidize a monopolizing company (IPC) and paying them for the privilege. It is not right to allow IPC to change the rules at their greedy whim. At the very least, those already connected with net metering should be allowed to continue at the current agreement or be grandfather in or not changed at all.** A close comparative analysis would be a bank account agreement whereby we regularly deposit money, only later to be informed that all moneys deposited would be confiscated due to the bank's whim!! **Please remember, we have always been Idaho Power's customers too!**

IPC claims that half of their power comes from hydro, wind, solar, biomass & geothermal sources. So then, logic tells us the other half comes from their coal-fired or gas powered plants. They further claim they are "doing their best to keep customer's rates low" but with their recent petition they seem to disregard the increase costs to **net-metering customers who produce green energy**. In our opinion, IPC is upset that FERC mandated them to honor their contract with those wind power producers and pay them for generating power. Also in our opinion, IPC would like to see the PURPA laws overturned.

Now, IPC wants to utilize their AMI meters to get "peak reading" in order to establish a new per kilowatt price characteristic. This new reading is multiplied by \$1.48 and its sum is combined to the new service fee. Example added for simplicity  $[(2+2=4) (6-4=2)]$ . All of these cost variables make up the customer's electric power use. However when solar energy is produced, it adds its own generated kW value on top of the customer's present meter reading, increasing the peak amplitude indications. The meter does not reset its self after the sun goes down. The meter carries that new peak reading until enough additional solar power is produced to reset the meter's solar peak indication. This will repeat its self for as long as there is an increase of peak solar energy. This value is used to set the constant Basic Load Capacity (BLC) rate and charged each month times the number of peak kilowatts. In spite of this, they only plan to review it every 6 months (182 days). We question IPC's method because they have already admitted their new AMI meters cannot read both the present grid use and the solar production at the same time, within the same meter.

Please just consider the following example (not factoring in any solar production): of 120 volts RMS, 60 cycles peak is 169.6 peak volts.  $[(RMS = 1.11 \times \text{average}) (\text{Average is } .637 \times \text{peak which is } 108 \text{ volts or } 1.57 \times \text{average} = \text{peak})]$ . To us, these figures indicate a built-in error (is approximately 42 percent increase) added to the other additional costs used in IPC's methodology for these proposed new rates for net-metering customers. Perhaps, IPC would prefer to monthly send out a meter reader (to all 353 net-metering customers) to examine those net-metering customer's inverters to verify their E-total output which is updated daily, and guaranteed by the manufacturer to be accurate.

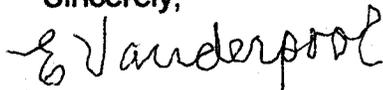
As both IPC's customers and retired employee's, we are greatly saddened by their recent IPUC request that penalizes their Net Metering Clients. In our opinion, IPC's does not consider their net-metering customer's huge expense (i.e. panels, inverters, wire, large earth machine work, any inventory, all hardware expense, labor or maintenance) for even a small solar production system. Net metering customers are not subsidized through public funds. We do not get any "special treatment" nor do we add any additional costs to their standard residential customers! We are enclosing our most recent bill that proves that we pay all the same fees as all their other residential customers.

IPC is a state-granted monopoly with vested interest to discourage any potential client's from investing in solar, wind or hydro electrical production. Furthermore, all of IPC's customers must pay for their TV spots, advertisements, brochures and alike in an effort to persuade people's thinking that IPC is actually trying to keep their costs down. Instead, in our opinion, they are cost motivated and they reap many benefits in using these legal tactics. Nowhere have they given an accounting or testimony as to their true costs for requested reimbursements dollars vs. net-metering customers just using up their own

power credits. Again, in our opinion, they "bundle" these statistics then give vague generalized statements and figures to the IPUC.

We believe they need to stop growing middle and upper management. Instead, they need to better understand all of their customers. They need to comprehend the true impact to the State of Idaho with job losses, lack of expertise, negative state growth, together with even more poor air quality, then coupled with global warming that will also impact IPC's hydro production. They need to recognize their own responsibilities to their customers and the State regarding their carbon footprint. Surely we consumers cannot be expected to pay for their flawed analyses and poor management decisions too! Therefore, we believe that the Idaho Public Utility Commission should deny their petition or hold a public hearing on IPC's request prior to changing the net metering rules and regulations (Case No. IPC-E-12-27) with such dire consequences!

Sincerely,



*E. Vanderpool*  
E. and E. Vanderpool  
6177 Somerset Lane  
Star, Idaho 83669  
208-286-0459

Cc:

Federal Energy Regulatory Commission  
Idaho Conservation League



www.idahopower.com

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: EVERETT & EILEEN M VANDERPOOL  
 Account Number: [REDACTED]  
 Billing Date: 01/11/2013  
 Print Date: 01/11/2013

<b>Due Date</b>	<b>Please Pay</b>
<b>01/29/2013</b>	<b>\$199.68</b>

**Account Activity**

Previous Balance .....	\$35.67
Payments - Thank You .....	\$35.67 CR
Balance Forward .....	\$0.00
Current Charges .....	\$199.68

**Account Balance** **\$199.68**

*CR #3721 1-16-13*

**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. Returned checks may be resubmitted electronically for payment. Checks remaining unpaid will be charged a \$20 fee.



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. To make a pledge, visit our Web site ([www.idahopower.com](http://www.idahopower.com)) or mark the appropriate box on the back of the pay stub.

**What is your energy use?**

**What is your energy use?**

What is your biggest day? Your biggest hour? Become an Account Manager at [www.idahopower.com](http://www.idahopower.com) and see your monthly, daily and hourly data. Be energy aware and learn ways to save money and energy. Use less and save more!



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Customer Name: EVERETT & EILEEN M VANDERPOOL  
 Account Number: [REDACTED]  
 Billing Date: 01/11/2013  
 Print Date: 01/11/2013

www.idahopower.com

Service Agreement No: [REDACTED]

Next Read Date: 02/07/2013

Service Location: 6177 SOMERSET LN/STAR, ID

Meter Number	Service Period		Number of Days	Reading Type	Meter Readings		Meter Constant	kWh Used
	From	To			Previous	Current		
[REDACTED]	12/07/12	01/08/13	32	Regular	194	2494	1	2300

Billing kW	BLC
23	0

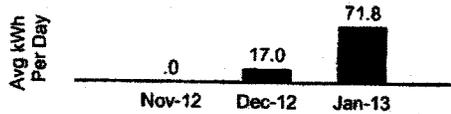
**Residential  
Rate Schedule  
I84R**

12/07/2012 - 01/08/2013 32 days

Service Charge .....	\$5.00
Non-Summer Energy Charge 0-800 kWh @ \$0.072355 per kWh .....	\$57.88
Non-Summer Energy Charge 801-2000 kWh @ \$0.080519 per kWh .....	\$96.62
Non-Summer Energy Charge Over 2000 kWh @ \$0.08996 per kWh .....	\$26.99
Annual Adjustment Mechanism .....	\$6.48
Energy Efficiency Services .....	\$7.46
Federal Columbia River Benefits Supplied by BPA .....	\$0.75 CR
<b>Current Charges - Electric Service</b>	<b>\$199.68</b>

CR = Credit kWh = Kilowatt-hour PCA = Power Cost Adjustment kW = Kilowatt BLC = Basic Load Capacity G = Generation

**Your Electric  
Use Pattern**



January 23, 2013

Federal Energy Regulatory Commission  
Attn: Mr. Nathan J. Davis  
Senior Deputy Secretary  
888 First Street, NE  
Washington, DC 20426

RECEIVED

2013 JAN 28 PM 3: 29

IDAHO PUBLIC  
UTILITIES COMMISSION

Re: Stop Energy Discrimination

Dear Mr. Davis,

At the outset, thank you for serving the public good and for the positive results your agency has accomplished in the United States. We are senior citizens living in Star, Idaho. We own an all-electric home and recently had a solar system installed to ease our electric utility burden. Idaho Power Company (IPC) has asked the Idaho Public Utility Commission (IPUC) to change its agreement with all of its net-metering customers. There are approximately 350 net-metering customers, who own small solar, wind and hydro systems. These folks also use their system to offset their electric utility burden.

The purpose of this letter is to draw your attention to a trend in suffocating or even killing off any chances of growth in renewable energy (with all its benefits) in the West. In our opinion, both Avista and IPC are stifling green energy growth in order to maintain a monopoly stranglehold over its customers. IPC is doing this under the guise of increasing the megawatt nameplate rating along with not performing or honoring their contract with their net-metering customers. In our opinion, IPC is waging a public image campaign to convince everyone their recent petition to IPUC is in fairness to all their customers, when in fact they are oppressing any opportunities for renewal energy within the state. Also in our opinion, they are upset with FERC's recent involvement with the large Wind Energy Developers. These utility companies do not want to pay even their small energy producers anything. However, they gladly except their energy production and take the credit for having green power in their mix. IPC has informed the IPUC that Avista is currently restricting its customers in the same manner as outlined in IPC's petition. It is our opinion, by not allowing the small producer to recuperate any of their costs and wiping out all of their green power credits it will kill any chance of reliable, efficient and sustainable renewable energy establishing a foothold within these States (Idaho and Washington).

We realize that FERC does not generally get involved with rate cases, but what bothers us is their selected abuse focusing on small net-metering customers. First they quadruple the service fees then they use a complicated formula made up of many variables to establish new rates and eliminating all payment to small producers. They gladly accept all of the power generated by these small producers. However, they do not want to pay for it, and they want to totally wipe off any green power credits at the end of year. They are actually petitioning changes that will make it far cheaper to just

remain a standard grid user customer tied to their system. Idaho Power generates more than half of their power from very expensive coal and/or gas fired plants which spew pollutants into the air. In our opinion, the bottom line is it is cheaper to remain a "standard use customer" than it is to build and operate even a small solar system. If this trend continues, no one will invest or incur the large financial liability or burden for even a small solar system. We are taking the liberty of including our most recent letter requesting the IPUC deny IPC's petition. Our letter has specific reasons why these changes are bad for any state. It does nothing but increase costs and dramatically stifles green energy growth by unduly discriminating against the solar industry and all the good it does. We strongly believe that if they are successful this trend will not end in the West but will spread across the country. In order to stop this movement, we are asking FERC to get involved to ensure that all rates, terms and conditions are just and reasonable, without discrimination in order to promote the development of safe, reliable, efficient and renewable energy along with protecting the public's interest.

Respectfully yours,



*E. Vanderpool*

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