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**Subject; Comments on IPC-E-12-27**

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To Whom it May Concern,

I have four areas of concern regarding Idaho Power Company's proposal to alter the Net Metering tariff.

**Fairness**

It is fair to say, I think, that none of the Net Metering customers view the current program as a path to financial glory. The odd check from IPC in the two-digit range does not fit that mold.

Rather, many, perhaps most, Net Metering customers take a sense of pride in the knowledge that they are being socially responsible by helping move the electric industry, however minutely, away from fossil fuels and toward renewable resources.

That said, they do appreciate being compensated for their investment. The installation of solar panels, windmills, etc., is a complicated process that requires substantial monetary investment. The monetary payback, such as it is, is often measured in decades.

IPC's current proposal, essentially, removes all chance for many Net Metering customers to ever recoup their investment. This would be fine if the customers had known as much before they made their investments. However, for IPC to change the rules after the fact, after the customers have irrevocably made their investments, seems patently unfair.

PURPA and Cogen customers get the option of 20-year contracts. It seems only fair that Net Metering customers should as well. If the commission chooses to revise the Net Metering tariff, it should grandfather the exiting net metering customers at the current rates.

**Trivialities**

If the commission grants permission to the company to raise the service fee to \$20 (a net increase of \$15) on the 354 net metering customers, they will receive a total of \$5,310 dollars each month. The benefit to IPC's other 460,000 customers will be about \$0.012 per month. Over the course of an entire year, each of IPC's other customers will see a benefit of a little more than a dime!

Speaking for myself, the benefit to me does not warrant the effective destruction of the current net metering program. I am more than willing to donate a penny a month, a penny I will never even notice, for the benefit of people willing to shoulder the social responsible of self installing solar panels, windmills, etc.

### **Social Responsibility**

IPC should be commended for trying to maintain low rates. And, IPC should be commended for emphasizing gas over coal in its most recent IRP.

At the same time, one has to recognize that gas is simply the next coal and the bigger issue still remains. Namely, the push to become 100 percent reliant on renewable resources for energy production remains the goal. It is not only the socially responsible thing to do, in the very long run, if we are to ever fully address climate change and finite natural resources, it is the only viable option.

Current Net Metering customers deserve tremendous credit for their efforts to date. They provide a much-needed glimpse into the future and provide ongoing test cases on how to proceed toward that future. In my mind we (IPC, IPUC) should be doing more, not less, to encourage customers to pursue conservation measures, and install and maintain renewable generation systems on their own properties.

### **Discrimination**

The applicant spends substantial time detailing the lack of equity associated with net metering customers not paying their full fixed costs.

Observation: This tends to be true only during months when there systems are in full production. When wind is light, or in winter when it is sun is low or it is cloudy, wind and solar net metering customers tend to pay bills at or near the same as conventional retail customers. It is better to say that they may not pay their full fixed cost contribution during all periods of the year.

However, even this is a distraction.

For the entire residential and small general service rate classes, most of the fixed cost portions of customer's service are rolled into the energy portion of their bills. Mathematically, this leads to the obvious conclusion that roughly half of all IPC

customers fail to cover their entire fixed costs and are being cross subsidized by the other half of IPC's customers.

Other things being equal:

Customers with above average bills tend to cross subsidize customer with below average bills.

Customers with large families tend to subsidize customers with small families.

Customers with all-electric homes tend to cross subsidize customers who have gas space and water heating, and gas ranges.

People who practice little or no conservation tend to subsidize the fixed portion of customers who do conserve.

Urban customers in dense neighborhoods tend to subsidize lower density rural residents with long distribution lines.

People without summer homes tend to subsidize the fixed costs of running lines to remote, rarely occupied vacation homes. (The author is familiar with a family member whose power bill on their vacation property has not exceeded \$10 in any month for more than a decade!)

If IPC is desirous of correcting the inequity of some customer's failing to cover their full share of fixed costs, addressing the items listed in the paragraphs above seems both more fair, and a source of far bigger returns than going after the paltry few net metering customers.

For IPC to single out only the Net Metering customers to recover the full amount of their fixed costs smacks of discrimination and should not be allowed.

Thank you for your time.

Regards,  
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**Jean Jewell**

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**From:** retrogeek@live.com  
**Sent:** Wednesday, February 06, 2013 2:27 PM  
**To:** Jean Jewell; Beverly Barker; Gene Fadness  
**Subject:** PUC Comment Form

A Comment from Kevin Cowgill follows:

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Case Number: IPC-E-12-27  
Name: Kevin Cowgill  
Address: 2801 Cherry lane  
City: Boise  
State: ID  
Zip:  
Daytime Telephone: 284.4215  
Contact E-Mail: [retrogeek@live.com](mailto:retrogeek@live.com)  
Name of Utility Company: IP  
Acknowledge: acknowledge

Please describe your comment briefly:

I have been a shareholder with Idaho Power for about 15 years. I know that monopolies pull some fast ones, but this is especially alarming. Is Idaho power so beholden to burning coal that it feels threatend by 353 net-metering customers? Huh? This is disappointing.

IP should be helping more customers to go solar, not raising monthly fees by 400%. More rooftop solar means less summer peak demand, less environmentally damaging coal use, and more power available to industry. Best of all, it teaches conservation.

I have a 2.2kw battery-based solar electric system and a solar hot water heater. It is my hope to further expand (more solar panels) and eventually have a grid-tied system. I firmly believe that Idaho has the potential to get 70 to 80 percent of its electricity (and thermal energy) from the sun. This is right now. Prices are coming down and efficiencies will increase.

The form submitted on <http://www.puc.idaho.gov/forms/ipuc1/ipuc.html>  
IP address is 168.103.130.59

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