

March 19, 2013



U.S. GREEN BUILDING COUNCIL
IDAHO CHAPTER

To: Idaho Public Utilities Commission

From: U.S. Green Building Council Idaho Chapter
PO Box 626
Boise, ID 83701

Subject: Idaho Power Company Filing IPC-E-12-27

RECEIVED
2013 MAR 19 PM 4:54
IDAHO PUBLIC
UTILITIES COMMISSION

Summary: We believe the proposal to change Idaho Power's net metering program undermines Idahoan's ability to generate their own power and unfairly penalizes a very small portion of rate payers whose onsite solar generation benefits the entire electricity grid during peak demand times.

USGBC Idaho urges the commission to eliminate the system wide cap on Idaho Power's net metering program and reject the proposed rate changes for net metering customers. The U.S. Green Building Council Idaho Chapter seeks to promote energy efficient design, building, construction and operation through education and community engagement. Our organization is made up of a diverse group of individuals and companies in the development industry ranging from architects, landscape designers, engineers, contractors, government officials, product manufacturers, students, developers, interior designers, building operators, appraisers, real estate agents, and more.

USGBC Idaho advocates for energy efficiency and distributed renewable energy in new construction and renovation in the residential, commercial, and public sectors because making our precious kilowatts go further is still cheaper than generating and distributing additional energy. In addition, there are significant societal and rate payer benefits to increased energy efficiency and renewable energy. USGBC Idaho would like to see more "net zero" homes and commercial buildings built and the proposed fee structure makes renewable energy less cost effective for a majority of potential net metering systems.

The size of Idaho Power's net metering program is small at this juncture so we encourage increasing the cap on how many customers can join the program, or eliminating the cap altogether. We also believe net metering customers are providing value to Idaho Power's electrical grid and to rate payers as a whole due to the match of peak demand and peak generation by solar net metering customers.

The solar installation industry and small scale renewable energy industry (micro hydro and wind) in Idaho is just beginning to expand and as advocates for green building USGBC Idaho is supportive of growth in that industry to serve growing interest from the public, businesses and Idaho schools. A robust and progressive net metering policy would help create jobs and stimulate economic development in Idaho and expand Idahoan's energy choices and ability to invest in energy independence and stability.

By reducing the financial benefits of investing in onsite renewable energy for homes, businesses, government buildings or schools, Idaho Power's proposed net metering policy changes will severely cripple investment in this growth industry as well as limit energy choices for rate payers. USGBC Idaho supports a robust net metering program because we believe it will strengthen the power grid

for our region and as the program grows it can help reduce the utility's need to purchase expensive power on the open market to meet high peak demand.

The proposed tariff structure is unfair to net metering customers. All customers using the same amount of electricity from Idaho Power should be billed the same amount and the proposed changes unfairly place a disproportionate burden upon net metering customers who are also providing value to the power grid and to fellow rate payers. It is also unfair to existing net metering customers who installed systems under the current rules that made economic sense and risk having their investments in renewable energy devalued by these proposed unfair rules.

The proposed tariff structure is bad public policy because it discourages energy efficiency and conservation. The larger the part of the bill that comes from fixed costs and the less the part that comes from per variable kwh charges, the less financial incentive the customer has to reduce consumption. The USGBCI encourages the consistent policy direction from the Idaho PUC that encourages energy efficiency and conservation. The proposed fee structure disincentives energy efficiency and conservation and goes against previous Idaho PUC precedents in setting good public policy.

Energy Security and Grid Stability

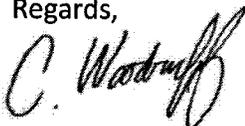
Moving towards a more distributed energy system versus building more centralized generation capacity and the necessary transmission capacity will help create a more stable and secure future for Idaho's energy infrastructure and communities. We know that building and maintaining transmission is a huge cost and has a lot of risk associated with it due to potential vulnerability to storms, fires, and potential domestic attacks. Distributed energy generation that a robust net metering policy would encourage would help move Idaho towards a more secure and stable energy future.

The proposed net metering changes fail to recognize the benefits of peak load reduction. Idaho Power's peak load occurs in the summer and they have recognized the benefit of curbing peak load in the past through programs affecting air conditioning and irrigation. Solar power is at a maximum in summer afternoons and matches up well with peak demand times in summer afternoons when irrigators are pumping and air conditioning is in high use. There is also benefit in that Idaho Power can purchase summer solar through net metering customers at a fixed known cost per kwh as opposed to buying energy on the unpredictable and volatile summer spot market or through building expensive new peaking generation facilities. This is a benefit to all ratepayers since all class rates go up when Idaho Power builds an expensive plant or purchases expensive power on the spot market.

We urge the Idaho Public Utilities Commission to reject the proposed fee structure while eliminating the cap on the net metering program capacity. We sincerely hope the Idaho PUC will direct Idaho Power to develop a new robust net metering program proposal that encourages small scale distributed renewable energy generation and is fair to all customers that doesn't have negative unintended consequences for energy efficiency and conservation efforts.

Thank you for the opportunity to comment.

Regards,



Charlie Woodruff
USGBC Idaho Chapter Executive Director



Mark Fledderjohann
USGBC Idaho Board Chair

Jean Jewell

From: kadensinclair@gmail.com
Sent: Tuesday, March 19, 2013 6:08 AM
To: Jean Jewell; Beverly Barker; Gene Fadness
Subject: PUC Comment Form

A Comment from Kaden Sinclair follows:

Case Number: IPC-E-12-27
Name: Kaden Sinclair
Address: 1750 Hill Terrace Lane
City: Boise
State: ID
Zip: 83702
Daytime Telephone: 208-401-4995
Contact E-Mail: kadensinclair@gmail.com
Name of Utility Company: Idaho Power
Acknowledge: acknowledge

Please describe your comment briefly:
The Idaho Power proposal to raise the rates applied to solar generated power and to eliminate any credit carryover after December of each year is concerning to me. I installed a 3KW solar power installation at my home and I still draw from the grid. However, I find this proposal disconcerting, as it provides no reasoning behind the changes. It stifles solar power deployments and innovation, and robs those persons who have installed a system that generates overages of proper credits. Unlike wind power, solar power generates at the peak times of the day, when energy is most useful and when Idaho Power benefits the most from additional production.

This proposal discourages renewable energy changes on the consumer level and is coming from a power monopoly, where no market forces afford protection. The cost of implementing such a system is partially offset by the amount regained via credits. Reducing this retroactively changes the cost of the consumer to repay the system installation.

I strongly object to this change and urge the IPUC to intervene and protect the citizens of Idaho from these changes.

The form submitted on <http://www.puc.idaho.gov/forms/ipuc1/ipuc.html>
IP address is 66.232.64.4

Jean Jewell

From: dw@dwdesignsco.com
Sent: Tuesday, March 19, 2013 4:13 AM
To: Jean Jewell; Beverly Barker; Gene Fadness
Subject: PUC Comment Form

A Comment from David follows:

Case Number: IPC-E-12-27
Name: David
Address:
City: Boise
State: ID
Zip:
Daytime Telephone:
Contact E-Mail: dw@dwdesignsco.com
Name of Utility Company: Idaho Power
Acknowledge: acknowledge

Please describe your comment briefly:

I am strongly opposed to any financial disadvantage that discourages individual or corporate entities utilizing alternative energy sources. Idaho Power customers should not be penalized for producing their own electricity. Our state, like many others is faced with a growing energy crisis and needs to be focused on promoting new and innovative ways to produce clean energy.

The form submitted on <http://www.puc.idaho.gov/forms/ipuc1/ipuc.html>
IP address is 96.18.227.238

Jean Jewell

From: ltldevl@hotmail.com
Sent: Tuesday, March 19, 2013 2:58 AM
To: Jean Jewell; Beverly Barker; Gene Fadness
Subject: PUC Comment Form

A Comment from Denise Dunlap follows:

Case Number: IPC-E-12-27
Name: Denise Dunlap
Address: 1573 S Rovian St
City: Boise
State: IDAHO
Zip: 83705
Daytime Telephone:
Contact E-Mail: ltldevl@hotmail.com
Name of Utility Company: Idaho Power
Acknowledge: acknowledge

Please describe your comment briefly:

Idahoans should not be discouraged nor punished for seeking alternative energy sources. Idaho Power's proposal to increase rates on such customers only serves to reduce competition and increase dependency on their service. We hear all the time about the growing energy crisis - Idaho Power should be encouraging customers to seek alternatives rather than raising rates.

The form submitted on <http://www.puc.idaho.gov/forms/ipuc1/ipuc.html>
IP address is 173.226.195.18

Jean Jewell

From: clbwfb@gmail.com
Sent: Tuesday, March 19, 2013 2:12 AM
To: Jean Jewell; Beverly Barker; Gene Fadness
Subject: PUC Comment Form

A Comment from Bill Boyer follows:

Case Number: IPC-E-12-27
Name: Bill Boyer
Address: 2748 N Terrace Way
City: Boise
State: Idaho
Zip: 83702
Daytime Telephone: 208-867-2752
Contact E-Mail: clbwfb@gmail.com
Name of Utility Company: Idaho Power
Acknowledge: acknowledge

Please describe your comment briefly:

It seems reasonable and logical that in this day and time we do not discourage any individual that is willing to invest and contribute power to our electrical grid. Penalizing residents with higher electrical rates will most certainly discourage the use of home solar energy use. It will also prevent additional sources of energy production to our electrical grid system. Above and beyond these reasons, very needed jobs in the Treasure Valley will be lost.

For these reasons please vote no to Idaho Powers rate increase request.

The form submitted on <http://www.puc.idaho.gov/forms/ipuc1/ipuc.html>
IP address is 132.178.2.64

Jean Jewell

From: marvsgallery@aol.com
Sent: Monday, March 18, 2013 7:33 PM
To: Jean Jewell; Beverly Barker; Gene Fadness
Subject: PUC Comment Form

A Comment from Scott Becker follows:

Case Number: case # IPC-E-12-27
Name: Scott Becker
Address: 5901 overland road
City: Boise
State: Idaho
Zip: 83709
Daytime Telephone: 2083754229
Contact E-Mail: marvsgallery@aol.com
Name of Utility Company: Idaho Power
Acknowledge: acknowledge

Please describe your comment briefly:
Idaho Power customers should not be penalized for producing their own electricity. Our state, like many others is faced with a growing energy crisis and needs to be focused on promoting new and innovative ways to produce clean energy.

The form submitted on <http://www.puc.idaho.gov/forms/ipuc1/ipuc.html>
IP address is 71.36.19.221

Jean Jewell

From: rvcital@boisestate.edu
Sent: Monday, March 18, 2013 11:28 AM
To: Jean Jewell; Beverly Barker; Gene Fadness
Subject: PUC Comment Form

A Comment from richard vycital follows:

Case Number: case # IPC-E-12-27
Name: richard vycital
Address:
City: boise
State: idaho
Zip: 83713
Daytime Telephone:
Contact E-Mail: rvcital@boisestate.edu
Name of Utility Company: Idaho Power
Acknowledge: acknowledge

Please describe your comment briefly:

I am aware the Idaho power is seeking to increase the charge to independent solar, wind and alternative fuel companies who are eligible to have their power put into the grid.

Idaho power is in fact a competitor to these other power generators, and yet control the distribution lines and related distribution of power generated from all sources in idaho to all parts of the USA.

I would urge the PUC to prevent Idaho power from assessing any fee, penalty or alteration of rates allowed for purchase/sell of power by these alternative energy companies..we will loose a precious opportunity to expand energy generation to alternative,useful sources if idaho power is given their request

The form submitted on <http://www.puc.idaho.gov/forms/ipuc1/ipuc.html>
IP address is 132.178.2.65

Jean Jewell

From: ninobalducci2006@hotmail.com
Sent: Monday, March 18, 2013 11:04 AM
To: Jean Jewell; Beverly Barker; Gene Fadness
Subject: PUC Comment Form

A Comment from Chris C. follows:

Case Number: IPC-E-12-27
Name: Chris C.
Address:
City: Boise
State: ID
Zip: 32132
Daytime Telephone:
Contact E-Mail: ninobalducci2006@hotmail.com Name of Utility Company: Idaho Power
Acknowledge: acknowledge

Please describe your comment briefly:

Idaho Power customers should not be penalized for producing their own electricity. Our state, like many others is faced with a growing energy crisis and needs to be focused on promoting new and innovative ways to produce clean energy.

Raising rates on clean energy is antithetical to progress.

Thanks for your time,

Chris C.

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