

Jean Jewell

From: puc@dagley.net
Sent: Wednesday, March 27, 2013 6:14 AM
To: Jean Jewell; Beverly Barker; Gene Fadness
Subject: PUC Comment Form

A Comment from Kelley Dagley follows:

Case Number: IPC-E-12-27
Name: Kelley Dagley
Address:
City: Idaho City
State: Idaho
Zip:
Daytime Telephone:
Contact E-Mail: puc@dagley.net
Name of Utility Company: Idaho Power
Acknowledge: acknowledge

Please describe your comment briefly:

RE:

Idaho Power's proposed 'Heavy User Discount Plan' aka 'Net Metering Service'

The 2012 Idaho Energy Plan, formally adopted by our elected representatives in the Idaho Legislature on March 6, 2012, states that:

'It is Idaho policy to encourage investment in customer-owned generation; therefore the Idaho PUC, utilities, municipalities, and cooperatives are encouraged to ensure non-discriminatory policies for interconnection and net metering.'

However Idaho Power's application [IPC-E-12-27], to modify its net metering service, stands in complete opposition to this admirable policy. It all but eliminates true investment in customer-owned generation and creates overwhelmingly discriminatory policies against genuine net metering. Consider each of Idaho Power's requests:

Idaho Power's 'Request to Increase Generation Capacity Limit' is a token gesture that guarantees, by their own projections, the denial of net metering applications in only a few years. Many states like Montana, Arizona, Arkansas, Oklahoma, and North Dakota specify no limit at all.

Idaho Power's 'Request to Modify Pricing and Implement New Tariffs' creates far greater inequities than it claims to mitigate. Careful analysis of the proposed rate and fee structure reveals that the most energy conservative quarter of residential users would see their bills rise so much that they could actually lose money on a monthly basis should they choose to become net meterers. In stark contrast, the heaviest energy using quarter could see huge savings on their bill by installing even the tiniest of systems. Why should a system installed by a heavy user be worth more than the same system installed by a moderate user? This is blatant discrimination against those who have lower power bills.

Idaho Power's 'Request to Modify Billing of Excess Net Energy' undervalues peak supplied energy and seeks to squeeze the window of net metering time so short that it actually encourages the wasting of energy. Most energy demands, like heating, cooling, and

agriculture, occur on an annual cycle that varies with the seasons. The value of this energy varies similarly based on demand. Systems designed to minimize grid energy usage must account for the entire annual period with a site specific end date. Anything less would waste resources, energy, or both. Idaho Power claims that net metering should settle monthly and arbitrarily cut off in December. They also claim that excess power generated in the peak of summer demand is worth the same as power used on a fall evening. Both claims are clearly wrong. This policy would discourage investment in properly sized systems and discriminate against generators supplying power during peak demand periods.

Idaho Power's 'Request for Tariff Modifications' is a one sided proposal with ill considered consequences which could negatively impact the adoption of net metering. Interconnection procedures for net metering should be based on consensus among all concerned parties. Any proposed obstacle to a simple, safe, and electrical code conforming installation should be closely scrutinized as a possibly unjustified barrier. Disconnect switches, five minute reconnect tests, three year recertifications, and high application fees all demand proper justification. Many states require none of these. The Interstate Renewable Energy Council's Model Interconnection Procedures are a good place to start. Every barrier to installation discourages investment in customer owned generation.

State policy demands that Idaho Power's application be denied in every aspect.

Thank you,
Kelley Dagley

The form submitted on <http://www.puc.idaho.gov/forms/ipuc1/ipuc.html>
IP address is 67.41.34.195
