

Jean Jewell

From: janet@buschert.com
Sent: Thursday, June 06, 2013 3:13 PM
To: Erik Jorgensen; Beverly Barker; Jean Jewell; Gene Fadness
Cc: janet@buschert.com
Subject: Case Comment Form: Janet Buschert

Name: Janet Buschert
Case Number: IPC-E-12-27
Email: janet@buschert.com
Telephone:
Address: 235 W Floating Feather Rd.
Eagle ID, 83616

Name of Utility Company: Idaho Power
Acknowledge public record: True

Comment: The following letter expands on my earlier comments to the Commissioners. Thank you.

Dear Commissioners,

I am writing to ask you to deny Idaho Power's application IPC-E-12-27 to modify net metering service and to issue additional policy guidance in the area of electricity. I am interested in this PUC application by Idaho Power because I'm a conservationist interested in reducing my carbon footprint. I am not a net metering customer, but could be in the future. I am also a business person and long time (30 year) member of the Treasure Valley community.

In the past our household thought of Idaho Power as an organization that understood the value of encouraging customers to conserve and that used a balance of short term and long term strategies for their business. That's all gone now, with investments that are 'too big to fail' in coal and natural gas along with a naive reliance on historical levels of hydropower in the future.

We watched with disappointment as Idaho Power reacted (we thought) too vociferously to the growth of wind power in the state, but we understood that the issues associated with wind might require some rethinking. That being said, the proposal now on the table with respect to their solar net metering customers is unbelievably out of step and regressive. It is, in fact, a solution in search of a problem. It's time for some adjustments in energy policy to protect the long term interests of Idahoans. I am writing to ask you to support such changes.

Idaho's long term energy strategy should include a complete 'arsenal' of energy options, particularly when there is so much uncertainty within the planning horizon. Changing weather patterns are likely to render hydropower a less predictable source of energy from year to year, and we'll need options to rely on when water years are lean. Betting the farm on coal and natural gas (and the huge capital investments and infrastructure development that they require) for the balance of our energy future is just bad strategy. It pits the interests of Idaho Power and its shareholders against the interests of the citizenry in a very unhealthy way.

Idaho Power should be continuing to experiment with alternatives and to research the possibilities (including the business models) achievable with alternative technologies rather than asking for changes so punitive that these options literally disappear. This

application, as submitted, will effectively shut down residential solar development in Idaho. It will damage local businesses that install and maintain solar, reduce the attractiveness of Idaho to green energy companies who might come to Idaho and rob Idaho Power itself of experience with solar that it sorely needs. And the worst part is that the stated reasons for the changes simply aren't compelling.

Let's briefly look at the major elements of the application one by one.

Expansion of the cap from 2.9 to 5.8. This selection was arbitrary (Idaho Power says as much) and not based on any particular time horizon or growth rate. This gives me some indication of how Idaho Power viewed the overall process, actually, and not in a very positive way. This new limit is very low in comparison to other states, and is not reflective of what the future strategy for power in Idaho should be. If part of this process is to assure a cap at some level to protect the integrity of the infrastructure and allow for review of the benefits and costs of solar as the technology develops, that's fine. The cap should be a lot higher than 5.8.

Rate changes. The analyses provided as background for this application takes into account all of the costs of solar and none of the benefits. Idaho Power continues to state that the cost of solar is prohibitive and therefore won't occur. But citizens committed to lowering their carbon footprint will make those capital investments out of their own pockets. Their provision of power back to the grid at peak hours in the summer will lessen peak power requirements, reducing the necessity for Idaho Power to invest in more generation and transmission infrastructure. And the distributed nature of this generation is a clear benefit to an organization that sources a very high percentage of its power from out of state. Lastly, by lowering the carbon footprint for the state we potentially avoid falling out of compliance with future Federal regulations. This is a place where change in policy can free Idaho Power to look at options for providing energy in a new way. Please encourage Idaho Power to include greenhouse gas emissions in their future planning processes. This will improve decision-making in the future.

The complete focus on costs versus benefits shows up starkly when Idaho Power talks about changing this rate structure out of 'fairness' to other residential customers. A number of folks who've done the math conclude that these new rates are more detrimental to net metering customers than to folks who simply conserve, although the net metering customers provide a benefit beyond the level of power they don't need to receive from Idaho Power. And this rate purports to incorporate expenses for a benefit that net metering customers purportedly receive that other residential customers don't. In this case the 'cost' is largely imagined, frankly. Lastly, this second structure presents an opportunity for consumers to game the system, which should indicate that something is definitely not ready for prime time here. Wanting to trust the folks at Idaho Power, I choose to believe that the issue is with the current policy and not anything nefarious on their part.

Handling of Excess Net Energy. This is perhaps the area where something possibly should be changed, but changes should not utilize a time period based on the calendar year. Utilizing the benefits of solar energy flowing back to the grid from net metering customers during the summer (and during peak hours) when it's most needed and then turning around and cutting off the associated 'credits' just about the time net metering customers will be utilizing them in the winter is just wrong. And other states have found better ways to deal with this question. Working off a different calendar year (starting in early summer, perhaps), and then allowing some number of 'credits' to flow over into the following year, for example, would be preferable and acceptable.

Whew. I know that is a long earful I've provided. I appreciate your willingness to read this along with the many other comments I'm sure you've received. I am asking you to deny this application and to provide policy guidance that will allow Idaho Power to be more

creative in developing the full 'arsenal' of energy alternatives we require for future strong and yet responsible growth in the great state of Idaho.

Thank you so much for all that you do. Best Regards,

Janet Buschert
235 W. Floating Feather Road
Eagle, ID 83616

janet@buschert.com

Unique Identifier: 75.174.101.229