To: Idaho Public Utilities Commission
PO Box 83720
Boise, ID 83720-0074

11 June 2013

Case No, IPC-E-12-27
Name: Keith Woodworth
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State: Idaho
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Name of Utility: Idaho Power Company
Public disclosure: Acknowledged

Additional Comments (prev. 1/14/13)

After reviewing the comments and concerns of the above case's Interveners, Public, IPUC Staff, and Idaho Powers (IPCo) Rebuttal Testimony, I have the following concerns or comments.

1. FERC. Although no one directly addressed the status of FERC and the issue of payments to Residential Net Metered customers, the "Idaho Conservation League"(ICL) document titled "State Level Data on Net Metering Capacity Limits and Rate Credits" – see attachment shows that Utilities in approximately 33 states "reconcile (pay for excess power). A Technician at FERC stated that generation below 20 mW was or could be exempted. I was then referred to "Legal Council – S.L. Higgenbottom (sp) at (202) 502-8564 for additional information. To date, "Legal Council" has not responded. Are 33 states also wrong?

2. Purpose of Net Metering. The purpose as defined by G.W. Said of IPCo (Rebuttal Testimony) is not the same as what I as a customer have used. My goal was to pay for the power that I used and the additional administrative costs with customer generated "Green Power" thus reducing IPCo' need for peak demand "Black Power (carbon based) -- and my bill! This has not been easy with an undersized system, wind turbine mechanical problems and now a slightly oversized PV system. Inflation proofing my power bill was always a concern but it was correctly assumed that costs would not decline. With the system as now proposed, I will no longer meet my objective and will be making a kWh donation to IPCo on top of monthly fees which cannot be paid for with kWh credits that IPCo has already billed to my neighbors on the grid- ref: ICL testimony of R. Thomas Beach pg 12 discussion.

3. Anniversary date: Having a "floating date" identified by each customer may be administratively workable but in the long run doesn't make much sense. Better is a fixed date – or two- for a couple classes of Net Meter customers which

approximates the break even point where average residential use equals daytime PV generation. Under the IPCo "roll over/grant" proposal, at this point, the least number of kWh's would remain on the "average" residents account.

4. Excess credit. During the year when my system produces excess power that is fed back to the IPCo grid, this excess is *sold* by IPCo to customers within sight of my residence. The value of this electricity is monthly paid to IP. To make excess kWhs a "roll over kWh credit" or "taken kWh number" defeats my reason for investing or participating in the Net Metered program.

5. IPCo, IPUC 2.,9/5.8 MW Cap. Initially I questioned the cap doubling in view of the negative impact of IPCo' new proposals. My logic was similar to that of Rick Gilliam's testimony on behalf of the City of Boise pg7-8. In view of additional information, there does not appear to be a good reason for *any* cap or at the most a percentage of "peak load" cap. If a cap of this sort is approached, IPCo certainly has the right of appeal to the IPUC for remedy.

6. A Net Metered Customer. At this point, any guess's as to "what should I do?" are just that. Reviewing the testimony of Courtney R. White on behalf of the Idaho Clean Energy Association, I do fall into the exhibit no. 705 group. Exhibit 701 further backs this status up with a –X,+Y (northwest quadrant). Perhaps anyone in the southeast quadrant might have reason to stay with the program depending on how far they are from the XY axis junction. The "way out" 5 or so points on these scatter graphs are ??? !

7. IPCo' Energy Efficiency Rider. Based on "radio noise", I'm guessing that this has something to do with IPCo' "we'll pay you $20. for your old refrigerator so you can save up to $100. per year in future electric costs". Larkin' Rebuttal Testimony, pg 21-22. Under the present system, because I produce enough "green energy" to offset my admin cost and IPCo sells my surplus power to "in sight" neighbors, I don't "pay a share of the costs….". Any program that does not address the efficiency of residential produced Green Energy is a flawed program. Speaking only for this residence, we know where the electric switches are and we faithfully use them. Efficiency is more than a high "R" or other energy rating.

Respectfully,
Keith Woodworth

Idaho Conservation League

State Level Data on Net Metering Capacity limits and Rate Credits

Idaho's current cap is the lowest in the nation - 0.1% of peak loads. Idaho Power proposes to revert from the mainstream practice of applying the retail rate, to join just 10 states. Twenty five states apply aggregate caps ranging from Idaho's 0.1% to Utah's 20% of peak load, with a mean cap of 3.66% of peak loads.

States are split on whether to impose an aggregate cap on net metering programs. Eighteen states do not cap net metering. Twenty five states apply caps based on utility peak loads, ranging from Idaho's 0.1% to Utah's 20%, with a mean cap of 3.66%. Eight states apply an individual system cap from 100% to 200% of on-site annual loads.

All states, except South Dakota, allow net metering to balance monthly customer loads and credits to accumulate annually. Forty states apply the regular retail rates. Only 10 apply some version of avoided costs.

Only 13 states apply an avoided cost rate to energy credits, with 32 applying the retail rate. States split on treatment of annual energy credits on customer bills. Thirty four states allow annual reconciliation, mostly at avoided costs. In this group, credits never expire in seventeen States, and seven allow customers to elect rollover or reconciliation. Only ten states grant annual excess energy credits back to the utility.

State	Capacity Limit			Net Excess Generation		
	Cap	State or Program Cap as % of utility load	Project Size Cap	Retail or Avoided	Grant, roll , Reconcile	Excess Generation Credits
Alabama		TVA medium size standard offer	between 50 kw and 20 MW	n/a	n/a	Seasonal and time of day rate at contract execution. 20 yr contract with 5% annual raise.
Alaska	1.50%	1.5% average retail demand	25 kw	Avoided	Roll	Monthly credit at non-firm power rate; indefinite carryover
Arizona	cust	No Cap	125% of customer load	Retail	Reconcile	Annual reconcile at avoided costs
Arkansas	no cap	No Cap	25 kw res; 300 kw non	Retail	Grant	Granted to utility at 12 month billing cycle
California	5.00%	5% of aggregate customer peak demand	1 MW	Retail	Option	Option for indefinite roll over or reconcile at average daytime spot prices
Colorado	cust	No Cap	120% of customer's average annual consumption	Retail	Option	Option for Indefinite roll over or credit at average hourly incremental costs
Connecticut	no cap	No Cap	2 MW	Retail	Reconcile	Annual reconcile at retail
Delaware	5.00%	5% of Electric Supplier's aggregated customer monthly peak demand	25 kw res; 100 kw farm; 500 kw to 2 mw non res.	Retail	Option	Annual option to roll over or credit at energy supply rate
Florida	no cap	No Cap	2 MW	Retail	Reconcile	Annual reconcile at avoided cost
Georgia	0.20%	0.2% of utility's peak demand during prior year	10 kw res; 100 kw non-res	Avoided	Reconcile	Monthly credit at PUC set flat rate
Hawaii	15%	15% per circuit distribution threshold for distributed generation	100 kw	Retail	Grant	Grant to utility after 12 months
Idaho	0.10%	0.1% of peak demand in 2000 (about 2.9 MW); 5.8Mw is about .17% of load	25 kw res; 100 kw non-res	Retail	Option	Option
Illinois	5%	5% of utility's peak demand in previous year	40 kw - 2mw	Retail	Grant	Grant to utility at 12 months. TOU Rates
Indiana	1.00%	1% of utility's most recent peak summer load	1 MW	Retail	Roll	Indefinite roll over
Iowa	no cap	No Cap	500 kw	Retail	Roll	Indefinite roll over
Kansas	1.00%	1% of utility's retail peak demand during previous year	25 kw res; 200kw non-res	Retail	Roll	Indefinite roll over
Kentucky	1.00%	1% of utility's single-hour peak load during previous year	30 kw	Retail	Roll	Indefinite roll over
Louisiana	0.50%	0.5% of retail peak lnad	25 kw res; 300 kw non-res	Retail	Roll	Indefinite roll over
Maine	no cap	No Cap	660 kw	Retail	Grant	Grant to utility after 12 month billing cycle
Maryland	8% (cust)	1,500 MW (~8% of peak demand)	2 MW or 200% of baseline customer load	Retail	Reconcile	Annual reconcile at "commodity energy supply rate"
Massachusetts	3%	3% of utility's peak load	by class: 60 kw, 1 mw, 2 mw. 10 mw gov.	Varies	Varies	Varies by system and customer
Michigan	0.75%	0.75% of utility's peak load during previous year	150 kw	Retail	Roll	Indefinite roll over; for >20kw - retail, for larger at power supply costs
Minnesota	No Cap	No Cap	40 kw	Retail	Option	Option for monthly reconcile at retail rate
Mississippi	n/a	TVA medium size standard offer	between 50 kw and 20 MW	n/a	n/a	Seasonal and time of day rate at contract execution. 20 yr contract with 5% annual raise.
Missouri	5.00%	5% of utility's single-hour peak load during previous year (annual limit of 1%of peak hour)	100 kw	Avoided	Grant	Credits at avoided costs; Expire at 12 months
Montana	No Cap	No Cap	50 kw	Retail	Grant	Granted to utility at 12 month billing period
Nebraska	1.00%	1% of utility's average monthly peak demand	25 kw	Avoided	Reconcile	Credit at avoided costs; annual reconcile
Nevada	2% (cust)	Statewide cap of 2% of total peak capacity of all utilities in the state	1 MW or 100% of customer annual requirements	Retail	Roll	Indefinite roll over
New Hampshire	50 MW	50 MW	1 MW	Retail	Option	option for indefinite roll over or annual credit at avoided cost
New Jersey	cust	No limit specified (BPU may limit to 2.5% of peak demand)	"sized not to exceed onsite annual production"	Retail	Reconcile	Annual reconcile at avoided costs
New Mexico	No Cap		80 MW	Avoided	Reconcile	Credited at avoided cost rate; Option for monthly reconcile
New York	1.00%	Generally 1% of utility's 2005 demand (0.3% for wind)	25 kw res; 2 MW non-res (1 MW farm biogass)	Retail	Reconcile	Annual at avoided costs for pv, hydro; indefinite carry over for wind
North Carolina	No Cap	No Cap	1 MW	Retail	Grant	Granted to utility at June 1; tou rates
North Dakota	No Cap	No Cap	100 kw	Avoided	Reconcile	Monthly reconcile at avoided costs
Ohio	cust	No Cap	"sized primarily to offset" load	Avoided	Reconcile	Credit at "unbundled gen rate", option for annual reconcile
Oklahoma	No Cap	No Cap	100 kw or 25,000 kwh/year	Avoided	Reconcile/ Grant	Monthly credits or grants to utility
Oregon	No Cap	No Cap	25 kw res; 2 MW non-res	Retail	Reconcile	Monthly reconcile at retail rate
Pennsylvania	No Cap	No Cap	50 kw res; 3 MW non-res; 5 MW special	Retail	Reconcile	Annual reconcile at "price to compare"
Rhode Island	3% (cust)	3% of peak load (2 MW reserved for systems under 50 kW)	5 MW "reasonably designed to meet 100% of annual load"	Avoided	Reconcile	Avoided costs, monthly roll over or purchase
South Carolina	0.20%	0.2% of utility's SC jurisdictional retail peak demand for previous calendar year	20 kw res, 100 kw non-res	Retail	Grant	Grant to utility on June 1: tou rates
South Dakota						
Tennessee	n/a	TVA medium size standard offer	between 50 kw and 20 MW	n/a	n/a	Seasonal and time of day rate at contract execution. 20 yr contract with 5% annual raise.
Texas	n/a	Green Mountain Energy programs	25 kw	Avoided	Reconcile	1st 500 kwh export at "rewards" rate, excess at 50% retail
Utah	20%	20% of 2007 peak demand for Rocky Mountain Power	25 kw res; 2 MW non-res	Retail	Reconcile/ Grant	Res: Grant to utility after 12 months; large comm and industrial - option for avoided costs or PUC rate
Vermont	4%	4% of utility's 1996 peak demand or peak demand during most recent calendar year (whichever is greater).	500 kw	Retail	Grant	Grant to utility 12 months after generation
Virginia	1%	1% of utilities jurisdictional load in prior year	20 kw res; 500 kw non-res	Retail	Option	Option for indefinite roll over or annual reconcile at avoided costs
Washington	0.50%	Currently 0.25% of utilities 1996 peak demand, increases to 0.5% on 1/1/2014	100 kw	Retail	Grant	Grant to utility after 12 months
Wash DC	No Cap	No Cap	1 MW	Retail	Roll	Indefinite roll over: retail rate including G,T&D for <100kw<, gen only for 1MW
West Virginia	3.00%	3% of peak demand in prior year	25 kw res; 500 kw comm; 2 MW indust	Retail	Roll	Indefinite roll over
Wisconsin	No Cap	No Cap	20 kw to 100 kw	Retail	Reconcile	Xcel: monthly carryover- annual credit at avoided costs.
Wyoming	No Cap	No Cap	25 kw	Retail	Reconcile	Annual reconcile at avoided costs
average	3.40%					

Jean Jewell

From: nospam21@outlok.com
Sent: Tuesday, June 11, 2013 8:30 PM
To: Erik Jorgensen; Beverly Barker; Jean Jewell; Gene Fadness
Cc: nospam21@outlok.com
Subject: Case Comment Form: IPC Customer

Name: IPC Customer
Case Number: IPC-E-12-27
Email: nospam21@outlok.com
Telephone:
Address: Pocatello
Pocatello ID, 83201

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

Comment: The potential for a $0 power bill is very attractive. I understand that Idaho Power does not want net meter customers to use net metered service as an avenue for revenue generation. I support the proposal of one of the petitioners to still apply financial credits to excess generation and to simply not ever pay out for excess generation. This discourages large amounts of excess production, but still keeps the possibility of a zero dollar power bill (which most will only achieve occasionally, if ever anyway).

Ultimately I hope that given the feedback from the public combined with the expert testimony the IPUC will reject the entire application and leave the program as is. I almost wonder if IPC didn't propose such outlandish changes to the program, that any subsequent proposals or compromises would seem all the more reasonable and acceptable.

I am also curious as to how many net metering applications have been processed since this proposal was made public. I heard from one installer that while interest is still high, new applications have dropped off to nothing.

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Jean Jewell

From: czamora@capai.org
Sent: Tuesday, June 11, 2013 5:16 PM
To: Erik Jorgensen; Beverly Barker; Jean Jewell; Gene Fadness
Cc: czamora@capai.org
Subject: Case Comment Form: Christina Zamora

Name: Christina Zamora
Case Number: IPC-E-12-27
Email: czamora@capai.org
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Boise Idaho, 83705

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

Comment: Dear Commissioners:
I respectfully urge you to consider the impact on small, sustainable businesses and customer choice that Idaho Power's Application to Modify Net Metering Service will have, both in the short and long term.

In Mr. Larkin's testimony, Exhibit 1, it is clearly illustrated how much interest customers have in controlling their own energy bills while supporting small businesses in their area. These customers are investing their money to support Idaho Power's system; this investment will reduce the need for investments by Idaho Power that affect all ratepayers.

This is an opportunity for the Commission to protect the interests of all customers and small businesses throughout Idaho Power's service area.

Unique Identifier: 65.126.121.194