

Jean Jewell

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Sent: Friday, July 05, 2013 10:34 PM
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Name of Utility Company: IPC
Acknowledge public record: True

Comment: Dear Commissioners,

Thank you for your timely ruling in this case. It seems like a livable compromise.

I am somewhat confused why you ruled the credits would be in kWhs instead of dollars (as the PUC staff pointed out was the most fair, in staff testimony). I believe in at least 3 past cases, precedence was set in valuing kWhs. The value of a kWh is not always the same. The PUC approved valuing summer kWhs and non-summer kWhs differently. The PUC approved valuing kWhs on the amount used with tiered rates. The PUC approved valuing kWhs differently based on the time of day. I agree with all of these past ruling as they send price signals to customers more closely reflecting actual costs of generation. This current ruling seems to be taking a step backwards by saying the value of a kWh is the same regardless of what time of year or time of day it was generated.

Idaho Power, even with the old method, can make a much higher than normal rate of return on purchased power from net-metering customers. These examples are based on a residential solar net-metering customer in the summer time. It is my understanding that most of these customers are credited back at the lowest Standard rate (7.84 cents per kWh). Idaho Power credits the net-metering customer 7.84 cents per kWh and that power is sold to another house next to their house likely at 9.58 cents per kWh or even 11.52 cents per kWh using the Standard Rate. If the house next door is using time of day metering it could be as high as 12.04 cents per kWh. So, for no capital investment on Idaho Power's part they could be receiving a rate of return off the power generated by a solar net-metering customer in the range of 22%-53%. They receive this rate of return when the next door house pays its electric bill. Idaho Power can invest this money as they like. The solar net-metering customer just receives a credit, without interest. I believe a dollar credit is the most fair and as the examples show Idaho Power still receives an above normal rate of return for nothing invested.

I also believe because of past rulings, net-metering customers should be able to participate in time of day billing.

Thank you for your consideration for future cases.

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