

9/30/13

Case Number: IPC-E-12-27

Dear IPUC Commissioners,

In response to your Order # 32880 issued 8/14/13 it was asked...

"If a net metering customer takes service through multiple meters at one or more premises, should the customer be allowed to apply net metering credits to offset usage on the other meters? If so, what conditions should apply?"

I believe that it would be fair, equitable and not in violation of FERC rules to allow a excess kWh credits to be applied to a net metering customers additional meter service accounts. This should include service accounts that are not in the same immediate vicinity as the net-metering service.

I also believe that it should be acceptable for a net metering customer to transfer excess kWh credit to any other IPC metered account. I believe that it would be fair to charge a nominal service charge to process the transfer as well as limit the number of transfer to once per every 90days.

I currently have a 3kW hydro system that is connect to a net metering service that supplies a shop building on one side of the property. Currently the shop service is producing excess power. On the other side of the property is a separate standard service from a different pole transformer that supplies the residence that consumes power. The cost to rewire the property to combine both services into would be substantial. The necessity to physically combine the services could be eliminated if kWh credits could be transfer between accounts. I'm aware of several other net metering customer with similar configuration.

I also have another residence that has solar panels that presently do not produce an annual excess. There may be a time in the future of lower power usage that the system would produce an excess. When that occurs I would like to have the option of transfer the kWh credit to a family member or a non-profit organization taking service from IPC.

In closing, I would encourage the Commissioners to be open to providing the greatest flexibility for net metering customer to handle excess kWh credit within current laws and regulations. Additionally there is the new rule that IPC is to provide annual reports concerning the operation of the net metering program which could be used to identify if transferring excess credit was problematic.

Thank you for considering my comments,

Scott Moore  
208-888-3618  
Meridian, Id

## Jean Jewell

---

**From:** mike@aurorapower.net  
**Sent:** Monday, September 30, 2013 5:08 PM  
**To:** Beverly Barker; Jean Jewell; Gene Fadness  
**Cc:** mike@aurorapower.net  
**Subject:** Case Comment Form: Mike Leonard

Name: Mike Leonard  
Case Number: IPC-E-12-27  
Email: [mike@aurorapower.net](mailto:mike@aurorapower.net)  
Telephone:  
Address: 5989 W. State St  
Boise ID, 83703

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

Comment: As a designer and installer of renewable energy systems in Idaho for over 25 years, I would like to see the PUC allow customers to apply credits to other meters. We have many customers that have multiple meters in various locations for farming, irrigation, or commercial applications. Many of these sites only have one usable location for their renewable energy resource, but multiple loads to offset. We currently have a customer we are working with that has three meters on their property; one for a very large South facing shop that has little load, one for irrigation, and one for the home. The shop is the only location that is un-shaded and can support a system large enough to offset most of their power consumption. Financially it makes more sense to install a system that can share credits with multiple meters in order to meet the customer's net demand on the utility. Wiring three separate systems is obviously much more costly, and will require three net metering agreements with Idaho Power instead of one. Excess credits should also be applied at the same time as the power is generated to account for the value of power at the time of day produced. This will better reflect the actual value of the power produced by the customer whether it is solar, wind, or hydro power.

Unique Identifier: 67.60.2.228

## Jean Jewell

---

**From:** kshogan@linora.com  
**Sent:** Monday, September 30, 2013 5:02 PM  
**To:** Beverly Barker; Jean Jewell; Gene Fadness  
**Cc:** kshogan@linora.com  
**Subject:** Case Comment Form: Kelly Hogan

Name: Kelly Hogan  
Case Number: IPC-E-12-27  
Email: [kshogan@linora.com](mailto:kshogan@linora.com)  
Telephone: 208-863-6547  
Address: 943 W Overland Road  
Meridian Idaho, 83642

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

Comment: PUC Committee:

As I testified in the hearings a few months ago, I operate one of the largest private solar arrays in the state located in Meridian Idaho on our commercial building. I installed a separate meter purely for the purpose of keeping my "generation" amounts separate from my "consumption." Since no accounting seems to happen at the billing entity level, my array appears to be violating the net metering objectives. This is simply not the case as I have two accounts with Idaho Power, and taking both into account one sees that I have provided a great service to Idaho Power with my array.

I believe the PUC should insure that Idaho Power permits net-metering providers generating a surplus to transfer that surplus in either dollars, or Kwh to another, related meter or account. In my case I have a consumption meter only 6 feet from my generation meter, and my commercial building consumes 3 times the amount of my generation. Should Idaho Power not provide a billing transfer between related meters, I will be forced to re-wire my installation, to consume my power prior entering my consumption meter. This would result in a cost of \$3-4,000 in expense, and it seems a waste since it could be easily accommodated at the billing level.

I look forward to the PUC helping keep the net-metering process simple, efficient, and not burdening current generation facilities with added expenses that were not part of our original ROI.

Thank You,  
Kelly Hogan

Unique Identifier: 64.128.89.82