

May 21, 2014

Idaho Public Utility Commissioners
472 W. Washington St.
Boise, ID 83702

Regarding: Case #IPC-E-14-09 Suspend Obligation to Purchase Energy Generated by Solar-powered Qualifying Facilities- Idaho Power Company's Petition and Testimony

Dear Commissioners:

This action by Idaho Power is in the wrong direction. Rather than making it more difficult for solar generating facilities to come on line, Idaho Power needs to be easing the way for solar to come on line and to make up a larger percentage in the mix of energy sources.

People can decide not to believe in accelerated climate change but not believing does not change the fact that it is no longer merely coming--it is here. Burning fossil fuels has caused it. We must move away from coal and replace it with sustainable sources that are not carbon based.

Hopefully Idaho Power will work to keep integration costs as low as possible for solar energy generators and encourage development, not stall it. According to their submission, they expect to have their integration study completed in June this year. Even if details require a little more time, all should be completed during the next couple of months even if it takes a few more days to determine how to minimize integration costs to solar producers.

Idaho Power collects donations from customers in their Green Program and perhaps some of these funds could be used to offset some of the integration costs of solar. My guess is that many, many customers would support accelerated solar energy development even if it meant slightly higher power bills.

It is unnecessary to suspend Idaho Power's obligation under PURPA for such a short time and doing so is only more discouraging for those developing or hoping to develop solar resources. The Company can continue talks with solar developers while their integration study is completed and means are put in place to minimize costs to solar producers.

Sincerely,



Lura J. Morgan, PhD
5459 N. Tuckerson Place
Boise, ID 83704



**IPC-E-14-09
Boise, Idaho
05/21/14**

WHAT DO YOU THINK?

If you cannot or do not want to testify in person at this hearing but want your opinion noted, please use the space below to write your comments. Add extra sheets as needed. You may either hand this sheet to a commission staff member or mail it to:

IPUC, PO Box 83720, Boise, ID 83720-0074.

You may also post comments on our Web Site.

<http://www.puc.idaho.gov>

Click "comments & questions."

I request that the Idaho PUC deny Idaho Power's request to suspend its obligation to enter into power agreements under PURPA. It's important that Idaho Power shift from coal-generated electricity to other sources. Climate change is a serious problem that we need to be considering right now. Rate payers may have increased costs but we have to think about how much it will cost in the future if we do nothing. Idaho Power needs to get more of its power from solar, not rely on coal plants.

Print Name Elizabeth Roberts Sign Name Elizabeth Roberts
Mailing Address 1357 N Mansfield Phone Number 938-1307
City and State Eagle, ID 83616 Zip Code 83616

Jean Jewell

From: heartfeltsong@msn.com
Sent: Wednesday, May 21, 2014 10:56 PM
To: Beverly Barker; Jean Jewell; Gene Fadness
Cc: heartfeltsong@msn.com
Subject: Case Comment Form: Lisa Hecht

Name: Lisa Hecht
Case Number: IPC-E-14-09
Email: heartfeltsong@msn.com
Telephone: (208) 331-2159
Address: 4920 E. Sagewood Drive
Boise ID, 83716

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

Comment: Sending an updated, abridged version of my testimony.

May 21, 2014

Honorable Paul Kjellander
Honorable Marsha Smith
Honorable Mack Redford

Idaho Public Utility Commission
472 West Washington Street
Boise, ID 83702

Re: Idaho Power Company Petition to Suspend Solar PURPA Obligations, Case # IPC-E-14-09

Dear Commissioners:

I thank you for the opportunity to submit comments to the Idaho Public Utilities Commission regarding Idaho Power Company's Petition to Suspend Solar PURPA Obligations. I have been an Idaho Power stockholder for 54 years. I am also a retired Hewlett-Packard engineer and program manager, and a parent whose children will experience the consequences of decisions made today.

To quote Kim Trout of Trout Law in an article written January 2nd, 2014: "As a regulated utility, Idaho Power is required to provide certain services in exchange for the opportunity to earn a "fair" return on its investments...In the period from 1998 to 2012 Idaho Power's actual return measured in earnings per share growth rose an average of 14.8 percent. As a frame of reference, according to data from Bloomberg and Thomson Financial, in the same 15-year period, Idaho Power returns were 117.9 percent higher than the S&P/Dow Jones Industrial Average indices for the same period."

Abundant evidence from the conclusions of the IPCC, an international body of climatologists, and data collected over the past century, indicates that climate change is already occurring and resulting in significant costs to Idaho citizens (ratepayers) in health and agricultural impacts, and national catastrophes, which are currently externalized costs to Idaho Power. Nonetheless, we ratepayers incur them in addition to any increases to electricity costs.

Clearly, Idaho Power is receiving more than a "fair" return on its investment, and its ratepayers are being asked to act as unwitting investors in oversized Idaho Power profits. At the same time, coal generation incurs unfair costs for ratepayers. Suspending PURPA and charging for utility connection removes the opportunity for ratepayers to reduce their externalized and direct costs by moving to solar and violates Idaho Power's legal charter of "fair" returns as a regulated monopoly.

Idaho is blessed with incredible solar energy resources. Solar installed on rooftops has the added advantage of removing the need for transmission lines and reducing associated losses, so adds to energy efficiency (reduced demand) as a resource. This is a demand reduction cost removed from Idaho Power. Furthermore, the need for peak generating power is reduced, since solar power output peaks at the same season and time-of-day that summer heat peaks in Idaho.

At the same time, costs for coal generation are rising as a result of increased governmental requirements. Stanford University just announced a divestment from coal and fossil fuels in its estimated \$18 billion endowment. It is clear that if Idaho Power continues in this direction, it will only increase costs for ratepayers, especially as currently externalized costs are included in rate costs. In fact, many studies have shown that, when currently externalized costs of coal electricity generation are included, solar power is clearly cheaper than coal.

Kim Trout's article ends with the line, "Idaho case law states, "the public interest is the paramount consideration of the commission...". Thus, where Idaho Power is acting as if it were an unregulated corporation, to maximize its profits without regard to all of the many costs to its ratepayers, it is the responsibility of the Idaho PUC to remind Idaho Power of the terms of its articles of incorporation and to protect ratepayers.

In conclusion, I believe that until Idaho Power demonstrates actual harm, it is premature to suspend the company's solar PURPA obligations. For the aforementioned reasons, I request that the Idaho Public Utilities Commission reject Idaho Power's request.

Thank you for the opportunity to submit comments.

Sincerely,

Lisa Hecht
4920 E. Sagewood Drive
Boise, ID. 83716

Unique Identifier: 71.209.21.211

Jean Jewell

From: rsandberg36@gmail.com
Sent: Wednesday, May 21, 2014 6:04 PM
To: Beverly Barker; Jean Jewell; Gene Fadness
Cc: rsandberg36@gmail.com
Subject: Case Comment Form: Robert Sandberg

Name: Robert Sandberg
Case Number: IPC-E-14-09
Email: rsandberg36@gmail.com
Telephone:
Address: 918 Haines Street
Boise ID, 83712

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

Comment: May 21, 2014

Honorable Paul Kjellander
Honorable Marsha Smith
Honorable Mack Redford

Idaho Public Utility Commission
472 West Washington Street
Boise, ID 83702

Re: Idaho Power Company Petition to Suspend Solar PURPA Obligations, Case # IPC-E-14-09

Dear Commissioners:

I thank you for the opportunity to submit comments to the Idaho Public Utilities Commission regarding Idaho Power Company's Petition to Suspend Solar PURPA Obligations. I am an Idaho Power stockholder and a ratepayer.

I believe that it is wrong to suspend Idaho Power's obligation to enter into power purchase agreements under PURPA for the following reasons:

1. Lack of due diligence. If in fact there is a necessity to add solar integration costs, Idaho Power has had plenty of time to research and assess what other utility companies have done in similar circumstances. They have not done so; they have not done their due diligence.
2. Timing. Introducing such a suspension at this time is highly suspect. It smacks of a stall tactic. And allowing only two days for a public hearing and taking public comment is also an effort to thwart public input.
3. False assessment. Idaho Power has only signed and executed contracts for approximately 60 MW of solar PURPA projects, a small fraction of the 501 MW the company alleges are "attempting" to sign contracts.
4. Legal question of suspending a federal law. We believe that suspending Idaho Power's PURPA obligations, especially with regards to contracts that have already been executed, sends a chilling signal to future investors of clean energy in Idaho. Additionally, outstanding legal questions remain concerning the state's ability to suspend the implementation of PURPA, which is an existing federal law.

5. History of resisting solar energy. Idaho Power just two years ago attempted to radically limit net metering. This is a common tactic among investor owned utilities around the country. Thankfully, with public input, the PUC wisely restored most of the former net metering implementation. Idaho Power would like to place a freeze on what it considers to be a threat to its business model.

6. Falsely considers solar energy intermittent. Idaho Power paints solar power in the same broad strokes as wind power. It is much more predictable, and it is most abundant during Idaho's times of heavy peak load—when it is sunny and warm and air conditioners are running. Also, a cloud passing in one location is counterbalanced by clear skies at the same time in another location.

7. Paints a picture of unique circumstances. Solar power has much deeper penetration in areas like Germany, and in this country in the following large, investor-owned utilities. These companies have found workable solutions to include renewable energies. Idaho Power is not unique; it can do the same as well. These utilities are:

- a. Austin Energy
- b. Berkshire Hathaway Energy
- c. Green Mountain Power
- d. NRG Energy
- e. Pacific Gas & Electric
- f. Xcel Energy

For all of the above reasons, please vote to reject Idaho Power's request to suspend their obligation to enter into power purchase agreements under PURPA.

Thank you for the opportunity to submit comments.

Sincerely,

Robert Sandberg
918 Haines Street
Boise, ID 83712

Unique Identifier: 67.60.248.206

Jean Jewell

From: Sandpointprices@frontier.com
Sent: Wednesday, May 21, 2014 5:10 PM
To: Beverly Barker; Jean Jewell; Gene Fadness
Cc: Sandpointprices@frontier.com
Subject: Case Comment Form: Rick Price

Name: Rick Price
Case Number: IPC-E-14-09
Email: Sandpointprices@frontier.com
Telephone: 208-290-1660
Address: 198 Old Sawmill Rd.
Sagle ID, 83860

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

Comment: I believe Idaho Power and all utilities should have to do all they can to conserve energy use in Idaho. This will keep them from having to build more plants. This conservation should include providing energy to their customers from small operators like solar users and wind power generators. They should not be allowed to say no. The IPUC should lead negotiations between Idaho Power and these small generators to be sure a fair price is paid to these small generators considering all factors.

Thank you for letting me comment.
Rick Price

Unique Identifier: 96.5.144.97

Jean Jewell

From: crsntmoonbeam@yahoo.com
Sent: Wednesday, May 21, 2014 7:00 PM
To: Beverly Barker; Jean Jewell; Gene Fadness
Cc: crsntmoonbeam@yahoo.com
Subject: Case Comment Form: Hydeec DasGupta

Name: Hydeec DasGupta
Case Number:
Email: crsntmoonbeam@yahoo.com
Telephone: 901 0122
Address: 401 Resseguie
Boise ID, 83702

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

Comment: Idaho power has an obligation to up hold. That is to up hold PURPA. Many of us are looking at solar to reduce our electric costs, not to raise them. Perhaps Idaho power should look into breaking into the market not squashing it. Thank you for allowing us to say something.

Unique Identifier: 174.232.129.146

Jean Jewell

From: torypearse@gmail.com
Sent: Wednesday, May 21, 2014 7:42 PM
To: Beverly Barker; Jean Jewell; Gene Fadness
Cc: torypearse@gmail.com
Subject: Case Comment Form: Tory Pearse

Name: Tory Pearse
Case Number:
Email: torypearse@gmail.com
Telephone:
Address: 3560 N Rock Creek Ln
Boise Idaho, 83703

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

Comment: I hope that as regulators you are paying attention to the incredible progress that is being made in other Countries and also in other States within the US. I also hope that you are educated about the impacts of climate change on our communities and throughout the world. I am an Idaho Power customer and if necessary, I am willing to pay higher rates for renewable energy. I believe that transitioning to clean energy is the most important issue of the day and I know solutions are in front of us if we will only roll up our sleeves and get to work. The fossil fuel industries have had their decades of subsidies and government support and they have taken us for granted. They have damaged our ecosystem and they have polluted our planet. Now is the time for change and we need you to do everything in your "power" to support the transition off of fossil fuels. Renewables threaten their profit model but they threaten our planet. Make your decision carefully as new models for energy including publicly owned utilities are emerging. Please support policies that encourage clean energy and help lead us into a better world.

Unique Identifier: 65.129.56.178

Jean Jewell

From: bakpakbiker@gmail.com
Sent: Wednesday, May 21, 2014 8:40 PM
To: Beverly Barker; Jean Jewell; Gene Fadness
Cc: bakpakbiker@gmail.com
Subject: Case Comment Form: Bryan DuFosse

Name: Bryan DuFosse
Case Number: IPC-E-14-09
Email: bakpakbiker@gmail.com
Telephone:
Address: 5303 W. Grover St.
Boise Idaho, 83705

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

Comment: I am asking that Idaho Power continue to be required to purchase, or provide, a percentage of their power by solar. Solar is an important and underutilized technology for power production and should be a large part of a diversified network of alternative energy solutions.

Unique Identifier: 71.20.39.78

Jean Jewell

From: edntucker@gmail.com
Sent: Wednesday, May 21, 2014 8:59 PM
To: Beverly Barker; Jean Jewell; Gene Fadness
Cc: edntucker@gmail.com
Subject: Case Comment Form: Ed Wardwell

Name: Ed Wardwell
Case Number: IPC-E-14-09
Email: edntucker@gmail.com
Telephone:
Address: 13268 Dechambeau Way
Boise Idaho, 83714

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

Comment: The idea behind PURPA is to require utilities like Idaho Power to be forced to integrate new alternative clean energies instead of the old dirty fossil fuels. Their business model is out of date by relying on fossil fuels and needs to be pushed into the 21st century. For the sake of our children and those unborn we need to reduce the carbon footprint of every utility. PURPA is just the start of what is needed for a better future. If Idaho Power was bankrupt and needed time and money to integrate that might justify a delay but that is not the case. The stockholders of which I am one can bear a slight decline in profits for the sake of the future. Idaho Power could change its business model and make money on clean alternatives but they are choosing to go the lazy way by asking for a waiver to follow the rules. Do NOT let them avoid the PURPA rules. We need to step up the requirement for solar not go backwards.

Unique Identifier: 66.232.82.175

Jean Jewell

From: r.casey.wilson@gmail.com
Sent: Wednesday, May 21, 2014 10:43 PM
To: Beverly Barker; Jean Jewell; Gene Fadness
Cc: r.casey.wilson@gmail.com
Subject: Case Comment Form: Robert Wilson

Name: Robert Wilson
Case Number: IPC-E-14-09
Email: r.casey.wilson@gmail.com
Telephone: 303-720-1282
Address: 2910 Wildwood St
Boise ID, 83713

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

Comment: I would like to let it be known that I feel the PUC should deny Idaho Power's request to suspend their obligation under PURPA to enter into contracts to purchase energy generated by solar power. I have been working in the solar industry for over 6 years now and recently relocated to Idaho because I had heard so many good things about the state. I was excited to gain employment with a solar installation company in the Boise area not even two weeks ago. I was very upset to hear that my job could be in jeopardy after such a short amount of time. The company I am working for is growing at a fantastic rate and is already talking about hiring another full time employee. Idaho has a tremendous solar resource available, it would be a shame to continue to let this resource go to waste and eliminate additional potential jobs in the state. Please don't help Idaho Power eliminate my job!

Unique Identifier: 67.60.61.114