

## Jean Jewell

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**From:** vanzandt@filertel.com  
**Sent:** Friday, August 14, 2015 12:53 PM  
**To:** Beverly Barker; Jean Jewell; Gene Fadness  
**Cc:** vanzandt@filertel.com  
**Subject:** Case Comment Form: Steve VanZandt

Name: Steve VanZandt  
Case Number: IPC-E-15-18  
Email: [vanzandt@filertel.com](mailto:vanzandt@filertel.com)  
Telephone: (208) 377-0268  
Address: 2335 N. Bird St.  
Boise ID, 83704

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

**Comment:**

Dear Commissioners,

I would like comment on Idaho Power's petition IPC-E-15-18 filed on 06/26/2015. The question comes down to whether this solar development is one project generating 1000 KW (1 MW) or ten smaller projects, each generating 100 KW. Site Based Energy is asserting the latter in order to qualify for more favorable contract terms.

Although I am an ardent supporter of solar energy and believe Idaho Power should try to accommodate these types of projects, I do think the company is justified in claiming that Site Based Energy is trying to game the system.

I'm not sure if there are statutes pertaining this kind of situation in utility regulatory law but I know similar cases have come before the US EPA under its stationary source air quality program. "EPA regulations allow aggregation of multiple pollutant-emitting activities such that they are considered a single stationary source only if all of the emission units: (1) are under common control, (2) "are located on one or more contiguous or adjacent properties," and (3) belong to the same major industrial grouping (i.e., have the same SIC code). 40 C.F.R. § 71.2."

Source: <http://www.bracewellgiuliani.com/news-publications/updates/sixth-circuit-epa-decades-nsr-aggregationsingle-source-applicability-deter>

In this case, if one accepts the premise that the EPA regulations can be used as a guide, I think it's pretty obvious that all of the criteria for single source eligibility are met and that this facility should not be allowed to disaggregate. - Sincerely, Steve VanZandt

Unique Identifier: 65.129.8.139

## Jean Jewell

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**From:** lexieprag@gmail.com  
**Sent:** Friday, August 14, 2015 8:15 AM  
**To:** Beverly Barker; Jean Jewell; Gene Fadness  
**Cc:** lexieprag@gmail.com  
**Subject:** Case Comment Form: Valerie Praggastis

Name: Valerie Praggastis  
Case Number: IPC-E-15-18  
Email: [lexieprag@gmail.com](mailto:lexieprag@gmail.com)  
Telephone:  
Address: 106 N Cove Lane  
Hailey ID, 83333

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

Comment: To Whom it May Concern,

One of the things I have enjoyed most about growing up and now making a life in Idaho is the understanding that each individual can make a difference. It is what makes Idaho so great. Regardless of political background, Idahoans believe that we each have the right to have a say in our collective future. We are more comfortable with small government and family owned businesses.

With this in mind, I am appalled that Idaho Power has petitioned against a local solar power project run by Site Based Energy. Idaho Power shouldn't have the right to decide which solar projects can be built as it is a manipulation of their position as a utility provider and distributor. This particular solar power project is legally defined as 10 different projects and should be treated as such. It shouldn't matter that the solar panels are located on the same site. They will be owned by ten different people or groups of people. This is no different than if there was a housing development on one site with each house having a small solar power panel.

In Idaho, we believe in a free market and in individuals. This is an example of the market being skewed by Idaho Power and not letting Idahoans choose their destiny. This solar project will not only bring economic development to our community, it will build community energy resilience. If we learned anything from the Recession, it is that we should be diversifying and supporting local initiatives rather than relying on the government or big business (in this case Idaho Power) from charting our future. Backing Idaho Power on this decision is taking jobs and wages from local Idahoans. Please put the power back in Idahoans hands.

Thank you for considering this matter,  
Valerie Praggastis

Unique Identifier: 184.183.117.179