

IPC-E-17-13

CLAREMONT
PARTNERS LP

September 15, 2017

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2017 SEP 18 AM 9:11
CLAREMONT PARTNERS LP
2153 EAST SOLITUDE COURT
BOISE, IDAHO 83712

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

Dear Sir/Madam,

As a concerned citizen, renewable energy generator, and former Boise City Councilman, I am writing to strenuously object to the proposal put forward by Idaho Power to close its net metering tariff (Schedule 84) and replace it with new tariffs for new solar customers. Not only will this discourage new adopters of renewable energy resources, but it will empower Idaho Power to exert its influence on the PUC to eventually increase tariffs for CURRENT users of solar and other renewable energy sources. Such an increase in tariffs would be the equivalent of a legal "taking".

My wife and I installed a solar system in 2015, and my decision to do so was largely based on the payback period which I calculated based on current electricity rates in Boise and the life cycle of the system. Increasing the tariffs on solar energy production for current users will dramatically alter the payback period and reduce the present value of these systems.

Idaho Power is behind the curve when it comes to encouraging renewable energy. They are in fact discouraging it with this proposal, thereby facilitating the deterioration of air quality in the Treasure Valley and harmful changes in our global climate. Idaho Power should be in the vanguard of solar adoption, as we are uniquely situated to take advantage of abundant sunshine. We must move away from carbon-based energy production as much and as quickly as possible. Please do not allow us to slide backwards into the fossil fuel tar pit that has already caused incalculable harm to our environment and quality of life. Thank you for your consideration.

Sincerely yours,



Diane Holt

From: idaho.dusty@gmail.com
Sent: Sunday, September 17, 2017 5:11 PM
To: Beverly Barker; Diane Holt; Matthew Evans
Subject: Case Comment Form: Dusty Lane

Name: Dusty Lane
Case Number: *IPC-E-17-13*
Email: idaho.dusty@gmail.com
Telephone: 208-991-0305
Address: 100 Pine Gap Rd
Horseshoe Bend ID, 83629

Name of Utility Company: Idaho Power
Comment: I believe that fair rates are needed for solar generating customers.

Unique Identifier: 192.183.161.38

Diane Holt

From: sgiannettino@gmail.com
Sent: Sunday, September 17, 2017 2:06 PM
To: Beverly Barker; Diane Holt; Matthew Evans
Subject: Case Comment Form: Susan Giannettino

Name: Susan Giannettino
Case Number: IPC-E-17-13
Email: sgiannettino@gmail.com
Telephone: 2084844319
Address: PO Box 4914
Hailey ID, 83333

Name of Utility Company: Idaho Power Company

Comment: We do not support the proposal from Idaho Power Company for changes to net metering rates; particularly we are concerned about creating a distinct net metering class of customers. The procedures outlined in Idaho Power's recent letter to existing net metering customers leaves a great deal of uncertainty in our minds. And for future renewable customers, the questions regarding Idaho Powers plans and commitment to renewable energy abound. We had hopes that Idaho Power would be a regional leader in conservation and green energy. In fact, when we got solar panels on our roof, we talked with Idaho Power staff on at least two occasions to ensure we understood the commitment of the utility and how net metering would work. And already they are proposing changes. We ask the PUC not approve these changes. If anything, a separate study should be conducted for the most inefficient nonrenewable users of power. Even then, we would not set up a separate rate structure but would do the study based on the data the company has access to without rate segregation. Thank you for listening to your public. Susan Giannettino

Unique Identifier: 159.118.88.197

Diane Holt

From: elias.bishop@auricsolar.com
Sent: Monday, September 18, 2017 4:22 PM
To: Beverly Barker; Diane Holt; Matthew Evans
Subject: Case Comment Form: Elias Bishop

Name: Elias Bishop
Case Number: IPC-E-17-13
Email: elias.bishop@auricsolar.com
Telephone: 801-598-5108
Address: 3568 E Lanark Dr.
Meridian ID, 83642

Name of Utility Company: Idaho Power
Comment: This is submitted to the ID PUC on behalf of Auric Solar.

Dear Commissioners:

Auric Solar respectfully asks the Commission to expedite a decision to dismiss Idaho Power's proposal in Case # IPC-E-17-13. If Idaho Power's proposal is implemented, it would devastate Idaho's distributed solar industry. As an official proposal from Idaho Power, even without being implemented, it is already creating customer/business uncertainty and harming Idaho's distributed solar industry. The proposal will increasingly inflict harm upon the industry the longer it isn't dismissed by the Commission.

This matter is urgent enough that Auric Solar will need to start planning to shut down its Idaho operations if the proposal is not dismissed soon. The rush to complete installs before December 31 will very likely put a strain on local jurisdictions' ability to permit and inspection installations, load installation crews to the maximum, and delay the time in which projects can be completed. This delay, along with the seasonal weather uncertainty, employee job uncertainty, finance/install time, and more, will force Auric Solar, and most likely others in the industry, to stop selling solar energy systems sometime in October. The layoffs of valuable personnel would shortly follow.

There are a number of items within the proposal that are disconcerting, unnecessary, and inappropriate. The most urgent concern is the December 31, 2017 cut-off date. There should not be a cut-off date, of any sort, when it has yet to be determined that the net metering program does, in fact, need to be changed. This is putting the cart before the horse. Thorough and appropriate analyses of the program need to be conducted before determining that changes are, in fact, needed. If after such analyses are completed and specific changes are determined then a cut-off date would be appropriate to discuss.

Also, it is unreasonable and harmful to Auric Solar and the solar industry to place new customers with on-site generation onto a new schedule. It is increasingly unreasonable and harmful to implement a new schedule for new customers with on-site generation without the determination of what the rates or structure will be. Again, this would devastate the solar industry and customers' ability to adopt solar. Furthermore, it is unnecessary to separate this sector of customers into a separate class to analyze or address an alleged cost shift. There are means to adequately analyze customers with on-site generation without separating them into a new customer classification.

On Application Page 2 of its filing, Idaho Power discusses the need to ensure that this growing segment of customers with on-site generation have “available to it a service offering that is fair-priced, scalable, and sustainable into the future”. Separating customers with on-site generation into a separate customer classification significantly hinders the ability to establish fair pricing. This segment of customers also adds benefits to the grid and to the customers who do not have on-site generation. Establishing a new rate schedule for customers with on-site generation would greatly undervalue these benefits and, therefore, would hinder the scalability of this sector. Furthermore, the proposed December 31, 2017 cut-off date is neither fair, sustainable, nor scalable.

Regarding changing the net metering program in general, multiple states, including Nevada, are seeing that it is best to get the decision right the first time versus trying to rush changes through that won't work. Within the filing, Idaho Power said that there were 1,468 net metering systems active or pending on June 30, 2017. That is a mere 0.03% penetration level. With such low penetration levels, changing the net metering program is unnecessary and not urgent.

Please dismiss Idaho Power's filing and the proposed December 31, 2017 cut-off date as soon as possible.

Respectfully,

Elias Bishop
Director of Government Affairs & Public Policy Auric Solar

Unique Identifier: 96.82.243.97