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Regarding the proposed changes to net-metering in Idaho Power's Oregon territory.

Idaho Power's recently accepted changes in Idaho have drastically changed how Solar energy is sold, a significant deficit to the consumer. Most of the Solar installers in our area have reduced their estimates to claim an offset of 40-45% of usage billing charges as it is currently impossible to accurately assess consumption and production rates for the year with constant changes in the value of compensation. Because an average of 45-50% of a homes energy can be supplied by a solar system in real-time; this is the only known value of energy not reduced by net-metering.

With 14 years of front-line industry experience in the heart of Idaho Powers's territory, the company I work for, EGT Solar, has been privy to each hearing and even taken part in several. I have read every filing and deposition from cases past. Historically Idaho Power claims a cost recovery needs to be addressed, however, does not provide an adequate value assessment; leaving holes in the most significant benefits of renewable energy and has been allowed to submit misleading and inadequate information somehow accepted by the IPUC with direct 3rd-party rebuttal dismissed without consideration. The IPUC, in my opinion, should service the people of Southern Idaho and seemingly dismissed all complaints and concerns from hundreds of hearing attendees and comments submitted online and handed Idaho Power the as-is acceptance they were looking for without truly considering contestation. I hope the OPUC will not make the same mistake, allowing Idaho Power to increase profits whilst the solar provider/generator, doing their part to help a wavering infrastructure and supplying a much-needed alternative energy source, must spend an additional 15.5-65% more to maintain the same level of offset of utility expense.

Using the quoted "average blended compensation for a self-generator" of 6.18 cents/kwh Idaho Power submitted in the Idaho Rate case last year and applying the tier-1 billing average for the year of roughly 9 cents/kwh we can assess a 31% deficit from the prior 1:1 (kwh:kwh) applied through Dec 2023. If I assume additionally that the average self-generator consumes 50% of the energy they produce in real-time we can conclude that the total value lessened by Idaho Powers Idaho rate-changes is an average of -15.5%. The amount of variability is massive btw, disproportionately affecting smaller (low income) systems as a service charge increase this year of \$5 to \$10/month and another next year will drastically increase the percentage of cost-gap from production costs to post net-meter consumption costs.

Solar providers in Idaho Powers territory can no longer provide accurate assumptions of offset due to the seasonal value changes and dramatically reduced net-meter compensation with variability day to day. Consumers cannot make an educated

purchase decision now and will rely heavily on the provider to supply an accurate assumption of the return on their investment. With ECR applications submitted each year by Idaho Power to further the gap of compensation vs. billing it is damaging all credibility a trusted, well-known installer should have and leaving the door wide open to misinformation from less-than trustworthy installers.

In an effort to thwart the misgiving from Idaho Power to significant investments from self-generators I am now forced to suggest installing expensive battery systems and simulating the net-metering process by maintaining as much grid-independence as possible. Battery systems need to be able to cycle roughly 50% of the daily kwh usage, still leaving a reduced compensation for winter months when production is dramatically lessened. Batteries will be programmed to discharge all available energy during the summer for increased compensation times (3pm-11pm) however, now leaving them drained and unable to provide the initial function of battery back-up in case of an outage. If the self-generator did not have to somehow increase compensation from the recent changes, they would have an opportunity to provide backup in emergency situations but now spend the extra money to offset the slap in the face to their investment.

In summary, the average system cost last year in southern Idaho, in attempt to offset an average of \$100/month utility bill was \$28,000 (Just over \$3.50/watt). An average system increase, to negate the changes, until the next ECR application in 2025 is 15.5% or \$4,340. If the same self generator were to purchase a battery to keep the 1:1 value of excess energy it would cost roughly \$18,000; leaving them no backup energy but a smaller margin of error for utility offset. The price tag increases dramatically for larger systems.

What would result of the OPUC decision if approved:

- Increased expense by 15.5% to 65% per solar system to provide the same offset of utility.
- Disproportionately affects low-income households.
- Dramatically increases job-loss and unemployment as Solar providers close doors.
- Creates inability for would-be self-generators to make accurate purchase decisions.
- Impossible for providers to quote accurate offset assumptions.
- Further negates environmental benefit of Solar Electricity.
- Increases Idaho Power's costs for demand/infrastructure growth.
- Negative PR for the state of Oregon as negating environmental impact of increased Solar energy.
- And many other negative effects.

The Oregon Public Utility Commission has a service to protect homeowners from unfair utility practices. I believe the IPUC made a significant mistake. I hope you do not make the same.

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