

Lisa Enourato

From: Adrian Carter <carter04.2012@gmail.com>
Sent: Friday, September 16, 2022 12:01 PM
To: Participate
Subject: Copy of email sent to mayor

Good morning/afternoon mayor of Ketchum and city Council president, I am one of many owners of a home in the city that is being screwed over by this avalanche chapter... within the last 40+years there has not been any avalanches... there has been more forest fires in the area then avalanches...

There are STR's that are on California fault lines and STR's in Hawaii where there is volcanic activity... care to explain the city's decision making on the Avalanche Chapter and screwing over owners?

if us owners can not rent out our homes/condos during ski season then shut down river run and warm springs lifts and lodges! Oh and Galena lodge also! They are in avalanche zone as well! and why is our lives any less important then tourists?

Ketchum is the only city in the state that screws over owners and members of the community... I am working closely with other owners and are considering whether to present this issue to the Mt. Express to expose the issue affecting owners and businesses in the community ...shutting down STR's by the lodges hits your bottom line! (Tourism) especially during peak season! We are all tax paying members of the community and we will have a case against the city and with the backing others in the community you will have no other choice but to revoke the chapter or it will affect your chances of getting re-elected... Other tourist destinations don't even think about shutting down their bottom line! If needed we will get the state government involved going as far as the governor...

Examples of ski destinations that have STR's that don't screw STR owners over are Aspen, Colorado- Jackson, Wyoming You think states back east shut down tourism during hurricane season? Ya they DON'T

Owners in the area would like to find a way we could all meet in the middle somehow... without this getting out of control...

Sent from my iPhone

Lisa Enourato

From: cfabian0202@aol.com
Sent: Friday, September 16, 2022 3:05 PM
To: Participate; Warm Springs Preserve; Neil Bradshaw
Subject: Access to Warm Springs Preserve from Aspen Drive

Dear City of Ketchum and Mayor Bradshaw,

My husband and I have lived on Aspen Drive for 25 years and we want to encourage you to preserve access to the Warm Springs Preserve from the Norwegian Woods side. We have always been able to access it from our end until now and are hoping that we will be able to continue to do so in the future. It is important to all of us in the neighborhood and many of us contributed to preserving the park-it is a wonderful asset to the city-and we don't have a dog anymore but still it's nice to walk over there! Thanks in advance.

Cindy and Mike Fabian
216 Aspen Drive

Lisa Enourato

From: H Boyle <Boylehp@yahoo.com>
Sent: Saturday, September 17, 2022 4:53 PM
To: Participate
Subject: Public comment 9/19 Council meeting.

At the same time the Council is pushing IPC to clean energy, the Council is being asked to approve multiple snow melting applications in the consent agenda.

Snow melting is energy intensive. What is the source of energy for these projects? Solar/wind? The usual IPC mix which is heavy on coal from WY, or natural gas that is being phased out in states like CA?

This is logically inconsistent on the part of the Council.

Thank you,

Perry Boyle
Ketchum

Lisa Enourato

From: H Boyle <Boylehp@yahoo.com>
Sent: Saturday, September 17, 2022 4:48 PM
To: Participate
Subject: Public Comment for 9/19 meeting
Attachments: ITEM-Attachment-001-7b4e9e3338734753b88519593360c17e.pdf

In the consent agenda is a letter to IPC. I struggled to understand the letter and what the Cities want IPC to do.

Am I correct the “asks” of IPC are

1. Consider in sight solar in their over all clean energy analysis.
2. Give a subsidy to households for insight energy generation.

As to the first, for solar to be apples to apples to baseload forms of generation like gas, coal or nuclear, the associated cost of energy storage should be included in the ask by the cities.

As for the second, given that on site generation via solar is cheaper than IPC rates, why is a subsidy necessary? Unless it isn't cheaper? This part was particularly confusing.

As members of the general public are unlikely to follow the contents of this letter, hopefully IPC will be able to.

Thank you,

Perry Boyle
Ketchum

<https://mccmeetingspublic.blob.core.usgovcloudapi.net/ketchid-meet-2c29b3625c5f421aaae5440ab3cbd9be/ITEM-Attachment-001-7b4e9e3338734753b88519593360c17e.pdf>



September 13, 2022

Commission Secretary
Idaho Public Utilities Commission
P.O. Box 83720
Boise, Idaho 83720-0074

Via Email: secretary@puc.idaho.gov

RE: Case No. IPC-E-22-22: Blaine County, City of Bellevue, City of Hailey, and City of Ketchum Comments on Idaho Power Company's Value of Distributed Energy Resources Study

Dear Commission Secretary:

On behalf of Blaine County and the City of Bellevue, the City of Hailey, and the City of Ketchum, Idaho, hereinafter collectively referred to as the "Parties", please accept these comments on Case No. IPC-E-22-22, in regards to Idaho Power Company's ((hereinafter referred to as "IPC") Value of Distributed Energy Resources Study (hereinafter referred to as the "VODER Study"). The aforementioned Parties, and all municipalities organized under the laws of the state of Idaho, have agreed to provide comments on the VODER Study's methodology, results, and potential impacts.

DIRECT AND SUBSTANTIAL INTEREST

The Parties established a coalition through a memorandum of understanding for the purpose of monitoring, providing comment, and intervening in cases brought before the Idaho Public Utility Commission as deemed necessary by the Parties to protect the public interests of the Parties' respective organizations and the residents, businesses, and populations served, all of which are Idaho Power Company customers that make up the Parties' constituency. Collectively, the Parties have mutually beneficial interests in the outcome of cases brought before the Idaho Public Utility Commission as the decisions may affect local self-governance, the promotion of welfare, and preservation of public health.

Countywide, constituents include a population of 24,729 of which 23% are Hispanic / Latino; 38% of households earn less than \$50,000 annually; 12.6% of persons' income is below the poverty line including 23% of children and 5% of seniors; 1,569 employer establishments; and 3,817 nonemployer establishments. (U.S. Census, 2021)

LOCAL AND NATIONAL SOLAR INDUSTRY

The Parties have been working together to make solar energy even more affordable, available, and accessible. Over the past few years, the local solar capacity grew an average of 20% annually. This growth helps to diversify the local economy and create new, good paying jobs for residents. The solar generating capacity of IPC customers in Blaine County reached 2.367 megawatts from 242 solar energy systems.

In 2022 compared to 2021, Idaho jumped from 35th to 27th for the overall solar adoption ranking, signaling a boom in the solar industry statewide. Jobs in the solar market are at an all-time high, providing 586 Idahoans with a livelihood (SEIA 2022). The Bureau of Labor Statistics projects an annual growth in solar photovoltaic installers of 27% through 2031. The U.S. median annual salary for solar installers in 2021 was \$47,670.

Decisions relating to case IPC-E-22-22, the VODER Study, have the potential to reduce the Parties' and our constituents' access to clean energy and the economic benefits of local, distributed energy generation. Additionally, local solar businesses and jobs will likely be negatively impacted by IPC's recommended methods for valuing customer on-site generation energy exports as evidenced by similar situations in neighboring states.

Nevada Case Study - Social Cost of Carbon

In 2015, the Nevada Public Utilities Commission voted to decrease the state's net-metering export credit rates. In turn, Nevada's largest solar companies fled the market. New residential solar permit rates dropped by 92% (Murro, Shaha, 2016). More than 2,600 jobs were lost. Undervaluing the solar export credit rate will likely lead to similar outcomes in Idaho.

OVERALL VODER STUDY CONSIDERATIONS

Both the Parties and IPC have committed to clean energy and climate goals. The Parties committed to achieve 75% clean energy for municipal electricity use by 2025; 100% clean energy for municipal electricity use by 2030; 100% clean energy for the communitywide electricity supply by 2035; 100% clean energy for municipal fleet vehicles and equipment to by 2035 as technologically and economically feasible; and 100% clean energy for all energy use by 2045. The Parties further committed reduce greenhouse gas emissions by 60% by 2030.

IPC also announced a voluntary commitment to 100% clean energy by 2045. IPC further established short-term, medium-term, and long-term targets to reduce CO₂ emissions intensity from company-owned generation resources compared to the 2005 baseline year by 35% for the period of 2021-2025, 86% by 2030, and 100% by 2045.

These goals are reflective of the United States' commitment to reduce greenhouse gas emissions by 50-52% by 2030 and achieve a 100% carbon pollution-free power sector by 2035. The Bipartisan Infrastructure Investments and Jobs Act will invest more than \$65 billion in clean energy and grid modernization, and the Inflation Reduction Act includes \$369 billion in clean energy and climate investments that will create extraordinary opportunities for state and local governments that are working toward commitments to clean energy and greenhouse gas emissions reductions.

Additionally, the U.S. Environmental Protection Agency (EPA) recently announced a new regulatory initiative that will address the nation's largest sources of both climate- and health-harming pollution. The EPA is currently considering rulemaking in the power sector – the largest stationary source of greenhouse gases in the U.S. – as well as other sectors.

CALCULATING THE EXPORT CREDIT RATE

In the Idaho Public Utility Commission (the Commission) Order 35284, page 27, the Commission ordered IPC to include “an evaluation of all benefits and costs that are quantifiable, measurable and avoided costs that affect rates.” Section 4 of the VODER Study outlines the methodology and variables analyzed to estimate an export credit rate for on-site generating customers that participate in the net metering program.

It is the Parties’ opinion that certain considerations of both the costs and benefits of solar were left out of Section 4 of the VODER Study, and therefore did not lend to a just and reasonable calculation of an export credit rate. The Parties urge the Commission to ensure that environmental costs and benefits that can be quantified and that would provide direct savings to customers and communities be considered.

Avoided Environmental Costs of Solar

In Section 4.1 of the VODER Study, IPC valued the avoided environmental costs and benefits of on-site solar generation at \$0.00. It reads “Environmental benefits that do not result in direct savings, or an avoidable cost, are not included in this study. Similarly, environmental benefits based on non-quantifiable or speculative values are not included in this study.” (VODER Study, page 61).

However, IPC’s 2021 Integrated Resource Plan utilized three separate methodologies to determine the social cost of carbon (Section 9.3, page 126). Despite acknowledging the social cost of carbon, and the associated methodologies to quantify it, these were left out of the VODER Study calculations. The social cost of carbon is a relevant metric that aims to measure the impact of climate change, such as the impact of ongoing drought conditions to hydroelectric energy generation and the impact of wildfires to transmission lines and grid resilience.

The social cost of carbon is a metric that estimates the economic damages that result from emitting one additional ton of carbon dioxide into the atmosphere (Interagency Working Group on Social Cost of Greenhouse Gases, United States Government, 2016). The metric is used to establish national climate policy and regulations. Currently, the National Academies of Sciences, Engineering, and Medicine is guiding an Interagency Working Group charged with updating the social cost of carbon. Until a new cost can be set, the working group is using \$51 as the social cost of adding one ton of carbon pollution into the atmosphere.

A new tool developed by the National Oceanic and Atmospheric Administration details the financial impact of climate change on counties and tribal lands. For example, the tool estimates that Ada County can expect an annual loss of \$6.1 million from wildfires and \$387,603 from drought.

Minnesota Case Study - Social Cost of Carbon

In a similar study evaluating the value of distributed energy resources, the Minnesota PUC approved pricing carbon emissions using the federal social cost of carbon. In 2015, the cost of carbon was priced at \$37 per metric ton resulting in a calculation of 3¢ per kWh of avoided environmental costs for the net metering export credit rate.

Equity Considerations

Rooftop solar is finally becoming a realistic option for low-income residents. Prices have dropped 53% over the past 10 years (SEIA 2022). The proposed methods for valuing distributed solar

generation have the potential to significantly decrease low-income residents' access to solar energy and ability to share in the benefits of the rapidly growing solar industry.

IPC MENU OF CLEAN ENERGY OFFERINGS

In December 2021, IPC submitted an application, Case No. IPC-E-21-40, to expand its optional clean energy offerings to customers. Specifically, IPC requested establishment of a regulatory framework for a future voluntary subscription program to be called *Clean Energy Your Way*. The application was the result of a significant increase in customer preferences and desires for clean energy. Through the application, IPC stated that it "set out to design a menu of clean energy offerings that would appeal to customers of all sizes."

In comments submitted in that case, the Parties encouraged IPC and the Commission to consider the *Clean Energy Your Way* program holistically as an element of a comprehensive set of clean energy offerings for customers. The Parties reiterate that decisions on the VODER Study will determine net metering rates and whether on-site customer generation are cost-effective investments for customers, including municipalities. And decisions on IPC-E-21-43, IPC's 2021 Integrated Resource Plan, will determine investments in energy efficiency and other beneficial clean energy programs.

The Parties encourage the following considerations:

- The ability of small, rural communities to participate in the *Clean Energy Your Way* – subscription program may be out of reach financially.
- If on-site customer generation becomes out of reach financially, then small, rural communities will be left out of both access to clean energy and the economic benefits of a rapidly growing clean energy economy.
- On-site customer generation should be included in IPC's "menu" of affordable clean energy offerings.

The Parties ask that the Commission take into consideration the long-lasting and far-reaching impacts of the decision on IPC-E-22-22. A just and reasonable approach is needed that includes all of the quantifiable costs and benefits associated with on-site customer generation.

APPROVALS: Executed and effective by the undersigned parties as of the date signed. DATED this ___ day of _____, 2022.

THE PARTIES HERETO have executed this instrument.

Dick Fosbury
Blaine County Commissioner

Date

Mayor Kathryn Goldman
City of Bellevue

Date

Mayor Martha Burke
City of Hailey

Date

Mayor Neil Bradshaw
City of Ketchum

Date



Lisa Enourato

From: Neil Bradshaw
Sent: Monday, September 19, 2022 10:25 AM
To: Jade Riley; Suzanne Frick; Morgan Landers; Abby Rivin; Adam Crutcher
Cc: Lisa Enourato
Subject: Fwd: Ordinance 1234

Importance: High

FYI

NEIL BRADSHAW | CITY OF KETCHUM

Mayor

P.O. Box 2315 | 191 5th Street, W | Ketchum, ID 83340

o: 208.727.5087 | m: 208.721.2162

nbradshaw@ketchumidaho.org | www.ketchumidaho.org

Begin forwarded message:

From: <bob@sunvalleyrealtors.org>
Subject: Ordinance 1234
Date: September 19, 2022 at 6:42:28 AM MDT
To: <participate@ketchumidaho.org>, "Neil Bradshaw" <NBradshaw@ketchumidaho.org>, "Amanda Breen" <abreen@ketchumidaho.org>, "Jim Slanetz" <jslanetz@ketchumidaho.org>, <mdavid@ketchumidaho.org>, "Courtney Hamilton" <CHamilton@ketchumidaho.org>

Ketchum Mayor and City Council:

Please consider the following comments, which were also provided to the Ketchum Planning and Zoning Commission, during your deliberation of Ordinance 1234. They are provided in order of the new ordinance sections to which they relate. Note that while our comment concerning section 13 is last on our list, it is of greatest importance to us, and the inclusion of section 13 caused significant concern with the Planning and Zoning Commission during its deliberations. Two commissioners who voted to recommend the ordinance to the Council stated that their doing so was because they felt that the Council ought to deliberate the need for section 13, rather than the Commission, hardly a ringing endorsement for it. Of course, one commissioner voted against recommending the ordinance at all due to the inclusion of section 13:

Ordinance 1234. Height and Density:

Despite the comprehensive plan stating that height and density are most appropriate downtown, neither additional height nor density is proposed by the ordinance. Should we be cherry picking which aspects of the comprehensive plan deserve support, or should all of its guidelines be included? Is it appropriate for the city to eliminate these tools that have been proven to support affordability and creation of workforce housing based on its internal evaluation of what the “public” wants, or should the city be the very body that ensures such solutions are included in public policy?

Ordinance 1234. Financial Feasibility:

There has still been no attempt to determine the financial feasibility of the proposed ordinance. While using the Love Schack parking study sheds some light on the possibility to provide parking within certain development scenarios, it does nothing to substantiate whether the cumulative effects of the provisions of Ordinance 1234 will allow for financially feasible projects. If financial feasibility is not modelled in advance of enacting this ordinance, there is no certainty that it will achieve the city’s stated goals or contribute in any way to our workforce housing and housing affordability problems. Much input is received by the city from consulting firms on other subjects, so why can’t experts in the field of real estate financial modelling be retained to confirm that this ordinance will achieve its stated, and the community’s, goals, rather than taking the crap-shoot approach that enacting the ordinance will serve our needs without doing such work?

Ordinance Section 4. Minimum Unit Quantity - Affordability:

There is no direct housing affordability component in ordinance 1234. More units do not necessarily mean more affordable units, save for the potential outcome that more sub-750 SF units (because they do not require parking) will be necessary in developments to meet the combination of commercial space and minimum number of units requirements. This is especially true if projects require some amount of large, luxury residential space in order to be financially feasible.

Ordinance Section 11.A. – Ground Floor Commercial Space Requirement:

Requiring 55% of the ground floor to be commercial space in areas of the CC and T zones that do not support such uses will put additional strain on luxury residential uses to subsidize those spaces, causing upward pressure on residential pricing. Is this a desired outcome, or should a more granular approach be taken before requiring this an all of the CC-2 and T zones?

Ordinance Section 11.D. Minimum Parking Required:

By requiring a development to include only the minimum allowed parking the ordinance could prevent project sponsors from providing any parking for units that are <=750 square feet (see code section 17.125.040 B). Given that the result of the other provisions of Ordinance 1234 could be the production of multiple units <=750 square feet in a project (or all units <=750 square feet as in the KETCH buildings) is this a desired outcome? If a developer wants to provide parking with units <=750 square feet that are being built to address affordability, shouldn’t this be allowed outright rather than requiring a more costly (time and money) conditional use permit?

Ordinance Section 13. Comprehensive Plan Compliance - Subjectivity:

Ordinance 1234 has been improved when compared to the previously proposed ordinance by replacing old section 9 (using the original section numbering as presented to the KPZ) with new sections 9 through 12, regardless for the moment of whether one agrees with the requirements of new sections 9 – 12. This is because the new sections replace what was previously the authority for the KPZ to engage in a completely subjective evaluation of a project, rather than working within objective standards as is required. However, by including section 13 in the new ordinance, this subjectivity is reintroduced. The KPZ can still impact the programmatic characteristics of a project through its subjective evaluation of it relative to the terms of the comprehensive plan, which plan is meant to be an aspirational, guideline document rather than included zoning policy, creating unnecessary uncertainty within the entitlement process. The terms of the comprehensive plan are always considered in the KPZ/KCC discussion of

projects subject to design review anyway, and we believe this ordinance would be further improved, and make the entitlement process fairer, by deleting this provision and section 13.

Thank you in advance for your time,

Bob Crosby
Government Affairs Director
Sun Valley Board of REALTORS
208-721-8353