

From: "Kevin & Emily Day-Shumway"
To:
Date: 10/29/2008 10:33 PM
Attachments: Net Excess Gen by State, 2007.rtf

Please add the attached document to comments on Docket 08-035-78.

In addition, please add my comment below to the same docket. I would like to see this information in the comments section for this docket at the PSC website.

It has come to my attention that for several months in 2008, Rocky Mountain Power has been crediting at the retail rate (not the avoided cost rate) excess generation for its Utah net metering customers. I spoke about it with Travis Tanner at Pacificorp's net metering offices. My understanding from his explanation was that because there are so few net metering customers who have excess generation, that it hasn't always been cost effective to train staff about the different regulations of each state in order to individually adjust each customer's bill. So for several months, Pacificorp net metering "adjusters" were simply doing the same thing for its Oregon and Utah customers. But the utility's intent is to eventually follow the laws for each state.

This made me think about how little money we are perhaps talking about in regard to net excess generation. With that in mind, I propose that the main issues include not only fully assessed value of renewable energy and fairness to the renewable energy producer, although these are extremely important, but also the cost savings for the utility with billing complexities. Many states and utilities have found that setting the net excess generation credit at the retail rate resolves this complication so that utilities, customers and regulators can move on the bigger questions like infrastructure and saving the world. I have attached a list of states and utilities and their crediting rates. 43 out of 59 utilities and/or states credit at the retail rate or higher.

Kevin Shumway

----- Original Message -----

From: Carol Revelt<mailto:CREVELT@utah.gov>

To: Carol Revelt<mailto:CREVELT@utah.gov>

Sent: Thursday, September 25, 2008 4:05 PM

Subject: Rocky Mountain Power net metering: request for comments and

FROM: <http://www.irecusa.org/index.php?id=90>

FILE: December_2007_NM_table

retail rate: 42 out of 59
 above retail: 1 (Tennessee)

STATE OR UTILITY	CREDIT RATE FOR EXCESS GENERATION
Arizona - Arizona Public Service	retail rate
Arizona - Salt River Project	average monthly market price minus a price adjustment of \$0.00017/kWh
Arizona - Tucson Electric Power	(retail rate?) - "credited to customer's next bill"
Arkansas	retail rate
California	retail rate
Colorado	retail rate
Colorado - Delta-Montrose Electric	granted to utility monthly
Colorado - Empire Electric Association	rate of average cost of power from wholesale supplier
Colorado - Fort Collins	retail rate
Colorado - Gunnison County Electric	wholesale rate
Colorado - Holy Cross	retail rate
Colorado - La Plata Electric Association	avoided cost rate
Connecticut	retail rate
Delaware	retail rate
District of Columbia	retail rate
Florida	retail rate
Georgia	retail rate
Hawaii	retail rate
Idaho	retail rate
Illinois - Specific rules developing in Docket 07-0483, opened 9/18/07	40 kW or less, 1:1 ratio; 40kW to 2 MW, credited at provider's avoided cost
Indiana	retail rate
Iowa	retail rate
Kentucky	retail rate
Louisiana	retail rate
Maine	retail rate
Maryland	retail rate
Massachusetts	average monthly market rate
Michigan	retail rate
Minnesota	retail rate - "average retail utility energy rate"
Missouri	avoided cost rate
Montana	retail rate
Nevada	retail rate
New Hampshire	retail rate
New Jersey	retail rate
New Mexico	avoided cost rate

New York	retail rate, except wind systems over 10 kW, which is credited at the utility's avoided-cost rate
North Carolina	retail rate
North Dakota	avoided cost rate
Ohio	utility's unbundled generation rate
Ohio - Yellow Springs Utilities	not addressed
Oklahoma	varies by utility
Oregon	retail rate
Oregon - Ashland Electric	retail rate
Pennsylvania	retail rate
Rhode Island	avoided cost rate
South Carolina - Santee Cooper Net billing pilot	between 3.2 and 5.7 cents per kWh, depending on whether power is received during non-peak or peak
Tennessee - TVA	2.21 cents above retail rate as of 5/2008
Texas	avoided cost rate
Texas - Austin Energy	(retail rate?) - "credited to customer's next bill"
Utah	avoided cost rate (original file showed retail rate, which is incorrect)
Utah - City of St. George	avoided cost rate
Utah - Murray City Power	retail rate
Vermont	retail rate
Virginia	retail rate
Virgin Islands (U.S.)	retail rate
Washington	retail rate
West Virginia	retail rate
Wisconsin	generally retail rate for renewables, avoided cost for non-renewables
Wyoming	retail rate