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Public Service Commission
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I wish to express my opinion as to the value placed on customer generated energy and the cap of .01%

The challenge is trying to find a balance point between fair market value of a customer's net-metering system and the utilities not having to subsidize solar installations. I believe this is possible using an existing program.

- 1) A fair market value for the excess energy generated by a net-metering system should be a one-for-one exchange (there are several municipalities currently doing this). This could be done at no additional cost to Rocky Mountain Power if the net-metering program was added to the Blue Sky Energy Program. This would allow Rocky Mountain Power to credit a one-for-one value on net-metered energy without having a loss in income.

With over 60,000 customers voluntarily subsidizing renewable energy, this would be a simple way to help increase the value of net-metering without putting a burden on the utility company. This would be an added incentive to Rocky Mountain Power to use this addition of net-metering in their advertising to add more volunteers to the Blue Sky Program. However, adding the Net-Metering Program to the Blue Sky Program should not have any affect on the limits established for the Net-Metering Program.

- 2) Any excess energy owed to the customer at the end of the year should be paid for. Rocky Mountain Power has sold this excess energy to other customers, generating an income. This excess should also be part of the Blue Sky pricing program.

Special consideration should be applied to agriculture irrigation systems as to the annual billing cycle. The current schedule would not be effective for seasonal use.

- 3) Net-metering systems should be counted as part of the RPS program. This would allow Rocky Mountain Power to add to the RPS requirements without additional cost to them.
- 4) The Renewable Energy Credits should be negotiated between the customer and Rocky Mountain Power in exchange for different levels of rebates. Short term ownership of the REC's for a smaller rebate and long term ownership of the REC's for a larger rebate as is done in Arizona

- 5) If a cap of .01% for net-metering systems is in place, then at which side of the meter base is the energy counted? By design, the renewable energy goes to consumption first, and then any excess will go back to the utility. Most net-metering systems may only net-meter 15% to 25% of the output. Which would mean that a rated 2kw solar net-metering system may only net-meter 300 to 500 watts of power? How then can you say that it counts as 2kw? The net-metering program should count what is net-metered not its rated capacity. That would mean that if you are counting the overall system rating size, then a much higher cap would be more appropriate.

- 6) Net-metering system size should be limited to a maximum of 75% of the average annual consumption. This will ensure the utility will continue to have a customer even though their consumption will be less. On average most customers choose not go over a 75% energy offset due to up front costs of the net-metering systems.

Sincerely,

Gerald Whipple
President
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