



Public Service Commission &lt;psc@utah.gov&gt;

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**Docket 13-035-184**

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Tue, Apr 8, 2014 at 9:42 AM

I am opposed to the Rocky Mountain Power's proposal to charge customers that use solar photovoltaic generation to produce and offset their power needs an extra fee (\$4.25 per month).

These customers finance their own power generation. Since that solar power generation offsets the NEED for RMP to finance, build and operate new coal or other power sources to meet the peak daytime power load, the photovoltaic customer is already saving RMP from spending new capital that might otherwise be idle during off-peak periods of the day.

RMP contends that non-solar generation customers are subsidizing the solar generation customers. I believe that argument is bogus. All of RMP's customer's benefit from this capital cost savings. Furthermore, if RMP were to install new facilities, they would have to invest in considerably larger facilities in excess of the current demand. Thus, having excess capacity that would be added to the rate base but would not generate revenue until growth in Utah balanced out the generation capacity with new demand.

Thus, RMP is asking for solar generation customers to pay for the privilege of deferring RMP its capital cost requirements. Furthermore, since the solar generation customer is still connected to the RMP grid and pays the basic monthly connection fee, that fee offsets the cost of service (billing, line maintenance, etc) for that customer even if the solar generation completely offsets the monthly consumption.

Note, a recent cost quote I had for solar photovoltaic power was at about \$3000 per kW. This is about the same cost as new generation for RMP so that capital cost savings in not trivial.

**Have a Nice Day!**

**Bill Quapp, Retired, PE Nuclear, CA.**

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