



Docket Number: 13-035-184

Message

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To: psc@utah.gov

Wed, May 28, 2014 at 5:31 PM

Dear Commissioners,

I urge the Commission to deny both the proposed \$4.25/month solar generator fee and the \$15/month minimum billing fee requested by Rocky Mountain Power.

Senate Bill 208 was adopted this year. It requires the Commission to:

1. Determine, after appropriate notice and opportunity for public comment, whether costs that the electrical corporation or other customers will incur from a net metering program will exceed the benefits of the net metering program, or whether the benefits of the net metering program will exceed the costs; and
2. Determine a just and reasonable charge, credit, or ratemaking structure, including new or existing tariffs, in light of the costs and benefits.

It isn't possible for the Commission to comply with the law and make a decision about the monthly fee without considering of the entire solar power issue.

This issue includes consideration of climate change, environmental quality (including air quality), quality of service, and the growth path for the Rocky Mountain Power monopoly.

The smattering of assertions made by Rocky Mountain Power that home based solar power generation systems place burdens on the grid is simply not truthful. The power produced by solar is produced when the load on the grid is at its highest, home solar power generation reduces peak system demand. Existing Rocky Mountain Power tariffs recognize this and provide lower cost power to industrial users for power consumed during off peak hours. In similar fashion homeowners that are willing to allow Rocky Mountain Power to control their power consumption during peak load periods receive rate reductions.

Installation of a home solar generation system is equivalent to converting all the household power consuming systems to highly energy efficient devices. It makes just as much sense for Rocky Mountain Power to assess a fee for using a high efficiency light bulb as it does for installing a home solar power generation system.

Home solar generation systems should be encouraged. The University of Utah U Community Solar project is an

excellent example of a program that offers substantial incentives through upfront cost reductions. Instead, Rocky Mountain Power offers a lottery that awards only enough customers to make the losers decide to wait until next year and also wants to assess the \$4.25 solar charge and the \$15 minimum billing charge which do exactly the opposite.

The request to increase the residential customer minimum billing charge from \$7 to \$15 per month to cover fixed costs not included in the usage portion of the bill is hugely unfair to low income customers and to customers that are reducing their carbon footprint. There is no reason for a minimum bill. Customers should pay for the power they use and all fixed costs should be reflected in the usage costs billed to the customers.

The Commission, acting as the customer advocate, should establish incentives that guide Rocky Mountain Power to invest in renewable energy sources. Clean air, reduction in CO2 and other greenhouse gasses, improving the environment, and hedging against climate change must all be considered when determining the true cost of energy to Rocky Mountain Power customers.

Thanks,

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