



PublicService Commission &lt;psc@utah.gov&gt;

## Comments for Docket 13-035-184

1 message

Mark D Larsen <yanquetino@casteyanqui.com>  
 To: PublicService Commission <psc@utah.gov>

Fri, May 30, 2014 at 8:41 AM

Public Services Commission:

I wish to point out, with empirical data, that Rocky Mountain Power's proposed penalty fee for solar is bogus -- and prejudicial.

Please consider the following table. It compares an average home in Utah with two homes that have invested in different energy saving measures. The first homeowner has installed LED lighting; the second, solar panels. In both cases these investments have reduced their power consumption by 4 kWh/day (122 kWh/month).

<b>Monthly Infrastructure Cost Comparison</b>			
	<b>Average Home</b>	<b>Home with LED Lighting</b>	<b>Home with 4 Solar Panels</b>
<b>BY DAY</b>	<b>280 kWh</b>	<b>280 kWh</b>	<b>158 kWh</b>
Fuel	\$8.75	\$8.75	\$4.94
Power Generation	\$8.65	\$8.65	\$3.75
High Voltage lines	\$3.85	\$3.85	\$2.17
Local Infrastructure	\$8.75	\$8.75	\$4.94
<b>Total</b>	<b>\$28.00</b>	<b>\$28.00</b>	<b>\$15.80</b>
<b>AT NIGHT</b>	<b>520 kWh</b>	<b>398 kWh</b>	<b>520 kWh</b>
Fuel	\$16.25	\$12.44	\$16.25
Power Generation	\$12.35	\$9.45	\$12.35
High Voltage lines	\$7.15	\$5.47	\$7.15
Local Infrastructure	\$16.25	\$12.44	\$16.25
<b>Total</b>	<b>\$52.00</b>	<b>\$39.80</b>	<b>\$52.00</b>
<b>24-HOUR TOTAL</b>	<b>800 kWh</b>	<b>678 kWh</b>	<b>678 kWh</b>
Total Fuel	\$25.00	\$21.19	\$21.19
Total Power Generation	\$19.00	\$16.10	\$16.10
Total High Voltage Lines	\$11.00	\$9.32	\$9.32
Total Local Infrastructure	\$25.00	\$21.19	\$21.19
<b>TOTAL COST</b>	<b>\$80.00</b>	<b>\$67.80</b>	<b>\$67.80</b>

WHY should the solar homeowner pay a \$4.25/month penalty surcharge for infrastructure, but not the LED homeowner? In both cases they have lowered their bill by the same amount, and are thus paying the very same reduced amount for RMP's infrastructure—including fuel, power generation, high voltage lines, and local wiring. There is no difference.

The conclusion is obvious. RMP is targeting solar homeowners --and not other customers who reduce their power

consumption-- in an attempt to discourage renewable energy.

Contrary to RMP's claim, solar homeowners pay for as much infrastructure as they actually use —just like everybody else.

The math doesn't lie.

Mark D Larsen  
672 Cholla Court  
Mns, UT 84738

=====

NOTE: The data for the above calculations come from RMP's own sources:

Average Utah customer's electricity consumption per month = 800 kWh.  
<https://www.rockymountainpower.net/ya/po/otou/utah/todf.html>

Average Utah residential rates per kWh = 9.98¢ (rounded to 10¢ for simplicity)  
<https://www.rockymountainpower.net/about/rar/rpc.html>

Breakdown of infrastructure costs per kWh as reported by RMP's CEO, Rick Walje  
<http://www.deseretnews.com/article/865594434/Are-rate-changes-needed-for-customers-who-generate-their-own-power.html?pg=all>