

TO: The Public Service Commission of Utah

Commission Chairman Ron Allen

Commissioner David Clark

Commissioner Thad LeVar

Executive Staff Director Becky Wilson

FROM: Summit Community Solar Steering Committee Members

RE: Public comments, Docket No. 13-035-184, In the Matter of Rocky Mountain Power's Intent to File a General Rate Case on or about January 3, 2014.

DATE: July 10, 2014

Dear Commissioners:

Please accept these comments in response to Rocky Mountain Power's proposal regarding a net metering fee in Docket No. 13-035-184, In the Matter of Rocky Mountain Power's Intent to File a General Rate Case on or about January 3, 2014. We are a group of Utah residents with an interest in a fair net metering policy for residential distributed solar. Thank you for the opportunity to provide input on this matter.

We represent a coalition of individuals who have volunteered as Steering Committee members to organize bulk-purchase programs for rooftop solar in Salt Lake County and Summit County. In 2012, dozens of homeowners from South Jordan to the Avenues participated in Salt Lake Community Solar. In 2013, individuals in Summit County used a bulk-purchase program to install five times more residential solar than had been installed in the previous year. Some of us are solar homeowners and others are not, but we share a common interest in a fair and balanced net metering policy that does not stagnate the growth of the solar industry.

We are concerned about the potential environmental and economic impacts of climate change on our community and we believe renewable energy will be a critical component of a sustainable future. Rocky Mountain Power's proposed \$4.25 monthly fee presents a barrier that may discourage private investment in renewable distributed generation and deny Utahns the opportunity to express a preference for renewable energy and receive fair compensation for their contributions. Net metering fees and hasty regulation can create market uncertainty and have a chilling effect on the solar industry, stalling a transition to cleaner sources of energy. We believe that a thorough analysis with opportunity for stakeholder input of the costs and benefits of net metering must preclude any decisions regarding net metering fees, as prescribed by Senate Bill 208.

Rocky Mountain Power's proposal has only addressed their lost revenues from solar customers; they have not put forth evidence of the actual costs. A thorough analysis looking at both the cost and benefits of distributed solar, and that involves stakeholder consultation and input, has yet to be conducted. It is necessary to evaluate both the costs *and* benefits that solar provides to the grid in order to avoid a potential decrease in private investments that likely benefit all ratepayers. Unduly penalizing homeowners who have invested in renewable energy is not the solution to reduce transmission costs. Investment in distributed renewables will allow the utility to offset the need for investment in fossil fueled generation facilities, and less energy is lost during distribution when electricity is produced in close proximity to a load.

Renewable energy is a hedge against fuel price volatility and an investment in our energy security. As we consider the potential impact of a drier future, distributed renewables will help to avoid the use of our limited water resources for cooling power plants. We have reason to be concerned about the impact of climate change on the economy as well: by 2030, a 15% reduction in snowpack could result in \$120 million of lost output, \$20.4 million in lost earnings, and 1,137 lost jobs at the ski resorts in Park City alone.[i] Ninety-nine percent of Utahns are willing to take personal action to improve air quality,[ii] and distributed solar provides an opportunity for individuals to reduce their carbon footprint and the emissions associated with their energy usage. Private investments in distributed renewables will result in an increased ability for our state to meet future carbon dioxide regulatory initiatives with market-based solutions. In the interest of creating an equitable playing field that allows customers to make educated choices about their energy usage, we ask that you prevent barriers, such as a new fee that is not yet justified by thorough analysis, and that will unnecessarily discourage individuals from investing in distributed renewables.

Distributed rooftop solar offers individuals an opportunity to express preferences for investment in clean, renewable sources of energy. In consideration of the numerous benefits provided by distributed rooftop solar, we support an analysis of Utah's net metering program that addresses both the costs *and* benefits of this technology, in line with the directive of Senate Bill 208, before any changes are made to impact this program. A thorough analysis of this issue will prepare the Public Service Commission to craft an insightful and equitable policy that will serve all Utah ratepayers well without imposing unnecessary barriers to the development of the distributed renewable industry.

Thank you to the Commissioners and the Commission staff for the opportunity to provide comments on this important issue, and for your consideration of our concerns.

Sincerely,

The undersigned individuals:

Salt Lake Community Solar Steering Committee:

Paul Anderson and Mary Ann Wright, Salt Lake City, UT
Marilyn and Jeffrey Marshall, Salt Lake City, UT
Rosine Oliver, Salt Lake City, UT
Mark and Denise Davis, South Jordan, UT
Jay and Eileen Vestal, Salt Lake City, UT

Summit Community Solar Steering Committee:

Lindsay Walsh, Park City, UT
Gaye Stoner, Coalville, UT
Tina Smith, Park City, UT
Stephanie Dolmat-Connell, Park City, UT
Don Rudy, Salt Lake City, UT
Jay Miles, Park City, UT
Leslie Thatcher, Park City, UT
Harriet Natter, Park City, UT
Linda Vernon, Coalville, UT
Tony Hiatt, Park City, UT
Jim Banister, Park City, UT
Dana Edmiston, Francis, UT

[i] "Climate Change in Park City: An Assessment of Climate, Snowpack, and Economic Impacts."
Prepared by Stratus Consulting Inc. for the Park City Foundation, September 29, 2009.
<http://www.parkcitymountain.com/site/mountain-info/learn/environment/ParkCityClimateChangeAssessment9-29-2009.pdf>

[ii] "Utah Air Quality Quantitative Findings." Prepared by HeartMind Strategies for Envision Utah,
September 25,
2013. http://envisionutah.org/images/projects/Your_Utah_Your_Future/Air_Quality/Air_Quality_Research_Results_Quantitative_Findings.pdf