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**docket 13-035-184**

1 message

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Thu, Jul 17, 2014 at 9:36 AM

To: psc@utah.gov

To the Commissioners-

I wish to express my opposition to Rocky Mountain Power's proposed charge of \$4.65 per month to net metering customers. I believe this proposal is flawed both in its factual basis and in the long-term vision it embodies for Utah's energy future.

As for the facts:

1. RMP claims that this charge is warranted because net metering customers do not carry their "fair share" of the costs of maintaining local power infrastructure. However, RMP's argument fails to take into account costs that net metering allows it to avoid. On example- since the excess power produced by solar panels is distributed to nearby homes, less demand is placed on the larger power distribution network, extending its life.
2. Although the contribution of home solar panels to overall power consumption is small at present, it has the potential to make a substantial dent in the demand RMP must meet. This should lead RMP to incentivize the installation of solar panels, whereas its proposal does just the opposite.
3. RMP argues that its peak demand does not coincide with the peak production of solar panels so that solar does not help it meet peak demand. This overlooks the possibility of storing solar-generated power for later use. Although several proven technologies exist to do this, RMP makes no mention of them or their potential to make solar power more effective in reducing overall demand.
4. RMP's argument projects current levels of demand into the future. It neglects the many ways demand can be reduced. To mention only one, as an architect I know that buildings account for about 60% of U.S. energy consumption. The International Building Code in effect in Utah is already sharply reducing buildings' energy consumption. A new model code that Utah could adopt would do so even further. Furthermore, growing awareness of the need to lower energy consumption of buildings is leading many building owners to voluntarily comply with energy saving standards such as LEED.

The vision of Utah's energy future on which RMP's proposal is based is simply more of the same- burning fossil fuels in large, centralized generation facilities. This contributes to Utah's poor air quality and global climate change. As a state whose economy is largely dependent on outdoor recreation, Utah should be a leader in using renewable energy sources. RMP's investment in renewable energy sources in Utah is presently zero. It should be investing in renewable energy sources, particularly solar, and basing its projections on assumptions of greater conservation. It should be looking to implement storage technologies that permit solar-generated power to be used at any time. Approving their proposed charge on net metering will validate this short-sighted vision. Homeowners who invest in renewable energy should be encouraged, not penalized.

As public officials charged with regulating a natural monopoly, the members of the PSC have the difficult task of balancing the interests of the public with those of a for-profit corporation. It is natural for a corporation to seek to maximize its profits. RMP's strategy is to continue business as usual, making minimal changes to a successful business model. Net metering threatens to reduce the amount of power it sells and this proposal is simply a strategy to compensate for this loss of revenue. However, it is not in the best interests of the public to allow RMP to continue business as usual.

I urge the commissioners to act on behalf of the public by denying RMP's net metering surcharge request. I ask

that you require RMP to provide a full, accurate account of avoided costs due to net metering which I believe will show that net metering actually benefits the company. Furthermore, I ask that by your actions you oblige RMP to take a long view of Utah's energy future and make renewable energy sources a core part of its business model going forward.

Respectfully,

David Ross Scheer ARCHITECT

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