

November 17, 2014

Docket #14-035-114

Dear PSC Committee Members:

RMP persists in its endeavor to impose a fee on residential net metering customers, yet the data RMP has presented to this committee is seriously flawed, as I enumerate below. Moreover, it seems patently unjust and unscientific for the PSC to only ask the stakeholder (RMP) to provide the necessary data. This is the epitome of corporate nepotism. Independent and scientifically valid studies of the various issues need to be commissioned by your members.

My objections to RMP's proposal are as follows:

1. The RMP has failed to propose a complete examination of load or energy demands (a) at various time intervals throughout the day and (b) at various geophysical locations that differ in terms of energy input and output. The cost-benefit analysis also needs to incorporate all net metering customers, both residential and institutional/commercial.
2. In this year's earlier net metering docket, many objected to RMP's approach to evaluating the costs and benefits of RMP's net metering program. Specifically, RMP failed then and continues to fail to conduct a thorough and full analysis of the **avoided costs** that net metering customers contribute. RMP takes into account only the costs *they* avoid. However, RMP needs to additionally consider costs avoided due to fewer transmission costs, reduced energy loss on transmission lines, reduced EPA compliance costs, the burning of less carbon fuel, the reduced need for power plants, and reduced vulnerability to fluctuations in fossil fuel prices.
3. Continuing in a similar but nonetheless distinct vein: Neither the PSC nor RMP have dedicated any attention to the "externalized" costs of burning fossil fuels to produce electricity. These real-world health care, economic, and environmental costs of burning carbon are shifted from RMP's financial calculations to our families and communities. RMP assumes it will not have to take these costs into account, because the PSC has never made it do so.
4. The PSC should set a schedule of technical conferences to address these additional cost-benefit research items as soon as possible. Investigation of avoided cost factors should not be allowed to fall behind as RMP moves forward with load research.
5. Rocky Mountain Power should not be trusted to do thorough and objective research and analysis without close, independent oversight. The PSC should engage a reputable, experienced third party to objectively monitor all aspects of the solar NEM costs-benefits investigation so that it produces legitimate results. This function should not be left to the Division of Public Utilities or the Office of Consumer Services, as these entities have already demonstrated bias favoring RMP in its previous solar surcharge request.

6. RMP has never demonstrated that net metering customers fail to pay FULLY for any impact they supposedly have on the system. It completely ignores the benefits to RMP from selling to non-solar customers the excess electricity generated by solar customers. Moreover, as per item 3 above, net metering customers as a class contribute in multiple ways to reducing externalized costs.

As a society and citizens of the world we have managed to destroy the planet and ultimately everyone's way of life. Our grandchildren, their children, and beyond will never experience the world as we have been privileged to unless the PSC, RMP, and similar bodies across the world assume the moral responsibility they rightfully have to help offset the damage already done.

Sincerely,

Tamara J. Ferguson

Ivins, UTAH