



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

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**Docket #14-035-114**

1 message

**DIANE ROSENBERG** <drosenberg@mac.com>

Mon, Nov 17, 2014 at 8:56 PM

To: psc@utah.gov

Dear PSC staff:

Regarding Rocky Mountain Power's proposed load research study with a costs-benefits analysis of solar net metering (NEM), please consider the following:

1. The costs-benefits analysis should include ALL net metering customers --residential and commercial/institutional-- which will provide more data to assess solar NEM impacts and value. The study should track NEM and non-NEM customers' energy demand at the same time intervals. The sample sets should be broadened to include geophysical characteristics that would affect energy input and output in different areas of RMP's Utah grid.
2. Any RMP load research study will not, in itself, sufficiently address the need for a thorough costs-benefits analysis of RMP's net metering program. For the costs-benefits study to be valid, it must include the full range of "avoided costs" that solar NEM contributes to the electrical system: such as less carbon fuel burned, less need for more power plants, fewer transmission costs and less energy lost on transmission lines, reduced EPA compliance costs, and less vulnerability to fossil fuel price fluctuations.
3. The PSC should acknowledge and consider solar's value in offsetting the so-called "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. 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.

Sincerely,

Diane Rosenberg