



PublicService Commission <psc@utah.gov>

UCARE Tech Conferences Proposal

1 message

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Dear Docket 14-035-114 Participants,

While lending its support to the NEM technical conferences proposal of fellow citizens groups, UCARE asks all parties to PSC Docket 14-035-114 to give separate consideration to the following:

UCARE Proposal for the PSC NEM Scheduling Conference on Jan. 12, 2015

UCARE respectfully requests the scheduling of additional technical conferences under Utah PSC Docket No. 14-035-114 for the purpose of evaluating health, economic, and environmental impacts of PacifiCorp's net metering (NEM) program pursuant to a full and fair determination of the costs and benefits of that program as authorized under Utah Code Ann. § 54-15-105.1

UCARE is aware that while the rate-setting process typically seeks to monetize a limited set of grid-systemic values according to the traditional utility market mechanism, a range of potentially significant costs and benefits is shifted from the utility and its customers to be suffered or enjoyed by the society at large. In our view, the traditional costs and benefits test equations are not adequate to the task of valuing these real societal impacts.

UCARE believes that the Utah public's interests will be best served by a robust, comprehensive examination of all costs and benefits of the entire NEM program; and, we believe that such an examination is not only warranted but possible. At the January 12, 2015 scheduling conference, UCARE will present topical research items and research citations justifying our call for scheduling the following technical conferences:

1) March, 2015. We request a technical conference for the purpose of identifying, valuating, and assessing for the purpose of rate setting all health impacts associated with the displacement of Rocky Mountain Power's (RMP) carbon-fueled electricity generation by electricity generated from residential and non-residential NEM customers. The scope of this conference should include, but not be limited to, data and analytical models that cover full-stream direct and indirect impacts.

2) April, 2015. We request a technical conference for the purpose of identifying, valuating, and assessing for the purpose of rate setting all environmental impacts associated with the displacement of RMP's carbon-fueled electricity generation by electricity generated from residential and non-residential NEM customers. The scope of this conference should include, but not be limited to, data and analytical models that cover full-stream direct and indirect impacts.

3) May, 2015. We request a technical conference for the purpose of identifying, valuating, and assessing for the purpose of rate setting all economic impacts associated with the displacement of RMP's carbon-fueled electricity generation by electricity generated from residential and non-residential NEM customers. The scope of this conference should include parameters set for the preceding two conferences and acknowledge that it may also include an aggregation of economic impacts identified, valuated, and assessed in the preceding

conferences.

UCARE further asks the PSC to consider scheduling another technical conference in June, 2015, that would examine how changes in state, regional, and national carbon emissions regulatory requirements, regional energy demands, and other sensitivities could affect the ratio of coal-to-gas combustion offset by NEM-generated power and thereby NEM's value to Utah.

UCARE has limited technical expertise; but, we will on January 12 suggest local and national entities whose expertise might be called upon to assist with the acquisition and analysis of data we anticipate the PSC's investigation will require. We will encourage additional suggestions from the public prior to the Feb. 6, 2015 deadline for comments.

Lastly, UCARE understands that the Commission will ultimately determine which data and values revealed by its authorized NEM study ultimately get internalized as rate setting factors. UCARE will be satisfied if the NEM study is complete and examines all factors.

Submitted by Stanley Holmes
for Utah Citizens Advocating Renewable Energy