March 5, 2015

Utah Public Service Commission
Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84114

RE: Docket ID # 14-035-114

I appreciate the opportunity to comment on this important issue. It is readily apparent that the rhetoric offered by Rocky Mountain Power and PacifiCorp about the costs—and alleged absence of benefits—associated with net metering is meant merely to quell solar energy growth. These tactics are far from new. Policies aimed at environmental protection and improvement offer an array of nonmonetary benefits, and while advocates of such policies have endeavored to quantify such benefits in an effort to comply with cost-benefit analyses, opponents have sought to minimize or dismiss them outright. In approaching the present issue, I urge PSC to consider the following:

Utilize independent consultants to gather and analyze data; do not simply rely on research provided by RMP and PacifiCorp. In order for the results of any research study to be considered reliable, objectivity is paramount. One study, conducted for Nevada state regulators by the consulting firm Energy & Environmental Economics (E3), found that the grid benefits of rooftop clean energy systems installed through 2016 will exceed the costs by $36 million. The conclusion was that net metering likely *undercompensates* Nevada solar customers for valuable energy production.

Address the economic and environmental costs of burning coal—costs that solar helps to avoid—as well as the many nonmonetary benefits associated with clean renewables such as solar. Net metering provides substantial statewide economic benefits in terms of jobs, income and investment. Net metering increases demand for solar energy systems, which in turn creates jobs for installers, electricians, and manufacturers in the solar supply chain.

Sadly, some utilities view net metering policies as lost revenue opportunities. In fact, net metering policies create a smoother electricity demand curve, allowing better management of peak electricity loads. By encouraging generation near the point of consumption, net metering reduces strain on distribution systems and prevents loss in long-distance electricity transmission and distribution.

Net metering programs are not established simply to perpetuate business-as-usual grid economics. They have specific policy objectives related to job growth, environmental, and other social benefits. It is key that net metering impact studies account for these very real benefits wherever feasible.

Include all solar customers in the study, not just residential. In California, for example, it is estimated that public agencies and schools will save $2.5 billion in electricity costs over the next thirty years using net metering. These are actual monetary benefits, and similar savings would allow Utah schools and public facilities to fund more and better programs.

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In sum, investment in local solar generation delivers real savings to the grid and other ratepayers. Please do not allow RMP and PacifiCorp to punish solar users and jeopardize Utah's environmental future by discounting the array of benefits associated with solar-generated power.

Sincerely,

K. Tess Davis
Salt Lake City, UT