



PublicService Commission <psc@utah.gov>

Docket Number: 14-035-1 14

1 message

Allen Sanderson <allen@sci.utah.edu>

Tue, Nov 29, 2016 at 6:49 PM

To: psc@utah.gov

Please find the attached letter regarding Docket Number: 14-035-114

 **RMP_BS.pdf**
82K

1744 South 1900 East
Salt Lake City, UT 84108
November 22, 2016

Re: Docket Number: 14-035-114

To the Public Services Commission,

I am writing to request that Rocky Mountain Power's (RMP) rate request under Docket Number: 14-035-114 be denied in its totality.

First, RMP's request to place residential solar customers who submit net metering applications after December 9, 2016 on a transitional rate structure is nonsensical. This request is akin to a City changing impact fees but not telling potential developers the new fees, i.e. any new developments will incur an impact fee but the rate is unknown and will go into effect at a to be determined date. A moving target is not appropriate in any public rate structure. If RMP wishes to request a new rate structure it must have a known rate with a known effective date.

Second, RMP's request to place residential solar customers into separate rate structure based on peak usage that is similar to commercial users is nonsensical. RMP's thesis that residential solar customers peak usage places a greater load on the grid system than other residential customer's peak usage is specious. Customers with air conditioning, electric ranges, and electric clothes driers place the greatest loads on the grid system. If a rate structure based on peak usage is needed then all residential customers should utilize the same rate structure.

Further, evidence of the peak electricity issue is unrelated to residential solar customers is the RMP Cool-Keeper Program which specifically targets summer time air conditioning. Solar users with air conditioning help with such grid loads because their electricity is used either themselves or utilized within very close proximity during the peak load time period. Thus reducing the grid load.

Third, RMP's request for a \$15 base rate for residential solar customers is nonsensical. Currently, the residential customers base rate is \$6. There is no justification for the additional \$9 in the base rate. RMP will not be providing any additional services. The increase in the base rate is nothing more than a mechanism to generate a fixed revenue stream when residential solar customers zero out their electricity usage.

Further, RMP has been granted by PSC an \$8 minimum billing amount, \$2 above current base rate of \$6. As such, RMP is already getting money for nothing when residential solar customers zero out their electricity usage. It should be noted that no other utility is permitted to have a minimum billing amount that exceeds the base charge. All other utilities charge customers for actual utility usage. It would behoove the PSC to remove the minimum billing amount from all RMP rate structures.

Forth, RMP's thesis that residential solar customers utilize less electricity and as such are not paying for the upkeep of the grid and other infrastructure is nonsensical. For instance, our range and clothes dryer were originally electric and have been replaced by natural gas appliances that have a lower "Energy Factor." Further, we took other measures to reduce our overall electrical and natural gas consumption by installing insulation, installing higher R rated windows, installing LED and florescent lighting, as well as other measures like energy efficient appliances. All of these were done before installing residential solar panels.

In fact, our overall electrical usage is so low that without solar on average we use approximately 480kWh per month, a third less than the average of 734 kWh per month. Naturally, with solar we have further reduced our electrical needs by approximately 140 kWh per month. Like us, other residential customers are also reducing their electrical needs regardless of the source. As such, under RMP logic they too should be required to pay more for the up keep of the grid.

Further, battery storage is becoming more and more economically feasible for residential solar customers. Some residential solar customers may choose to utilize such storage rather than net meter the excess. Will RMP propose a rate structure for those customers?

Fifth, though RMP proposed rate structure would not apply to current residential solar customers there is no doubt that if this rate structure is approved that RMP would seek to apply it to all residential solar customers as it is inherently unfair to have two rate structures for residential solar customers with the only difference being when they signed a net metering agreement.

Sixth, it is worth comparing difference rate structures. Using my home electrical usage for the past year and an approximate peak usage of 2.0 kW (average: 3.4 kw) the following costs are illustrative:

No solar electricity installed	\$611.
Proposed rate structure assuming 2.0kW peak usage	\$437.
Current rate structure w/net metering at wholesale value, \$0.03 kWh	\$351.
Current rate structure w/net metering at midpoint value, \$0.06 kWh	\$260.
Current rate structure w/net metering at full retail value, \$0.08898 kWh	\$185.

If RMP treated residential solar customers as wholesale solar producers and paid wholesale rates of \$0.03 kWh current residential solar customers would be paying \$86 less than the proposed rate. Using a hypothetical mid point rate of \$0.06 current residential solar customers would be paying \$177 less than the proposed rate. However, PUC/PSC studies have determined that residential solar electricity has a greater value than the retail rate*. As such, the more appropriate rate would be the current net metering structure where residential solar customers would be paying \$257 less than the proposed rate.

- <http://environmentamerica.org/sites/environment/files/reports/AME%20ShiningRewards%20Rpt%20Oct16%201.1.pdf>

The above shows the fallacy in RMP proposed rate structure, that it in fact will far exceed the cost of residential solar customers who utilize the grid for their excess electricity even if they were paid wholesale rates.

Seventh RMP states that residential solar customers are being subsidized by other residential customers on average \$400 per year. This amount is nonsensical. Our solar system net metered approximately 3.0 MWh this past year (3.6 MWh average). If our subsidy was even half, \$200 per year our current bill would be \$385. That amount is more than if RMP paid a wholesale rate for our excess solar electricity, \$351.

Eighth, if residential solar customers are such a bane, why does RMP offer their Utah Solar Incentive Program, or their Subscriber Solar Program, or their long time Blue Sky Renewable Energy Program? Quite simply because RMP controls every aspect of these programs, including the profits, they cannot do that with residential solar installations.

Because of the above reasons the proposed rate structure should be denied in its totality. Instead, I would suggest that the Utah PSC commission, like several other PSC and PUC commission its own *independent* study to determine the value of solar electricity and not rely on the biased one-sided data provided by RMP.

Sincerely,



Allen Sanderson



PublicService Commission <psc@utah.gov>

Solar

1 message

Brent Baranko <brentbaranko@comcast.net>

Tue, Nov 29, 2016 at 9:01 PM

To: psc@utah.gov

Do you see the future?

Citizens want to move forward with alternative energy. We are on the cusp of an energy revolution. For RMP to change their net metering agreement (increasing the cost for new home solar installations) is backwards. While we do use the grid, we are using most of our photovoltaic produced electricity in our own homes. Furthermore, the excess is local. It's like a micro grid. We are not transporting energy via the grid pulling energy from a coal fired plant in Wyoming.

RMP should be innovative. They should be proactive. They should be progressive. Come up with an energy structure for the impending, inevitable future.

Thanks,
Brent Baranko, MD
Nissan Leaf owner
Solar panel owner
Anticipated Tesla Model 3 owner

This is a great read; <https://electrek.co/2016/11/25/6-major-countries-phase-out-coal/>



PublicService Commission <psc@utah.gov>

18,519 signers: Save Solar for Utah - Affordable Solar Power in Jeopardy in Utah petition

1 message

Ryan Evans <petitions@moveon.org>
To: Public Service Commission <psc@utah.gov>

Wed, Nov 30, 2016 at 1:34 AM

Dear Public Service Commission,

I started a petition to you titled [Save Solar for Utah - Affordable Solar Power in Jeopardy in Utah](#). So far, the petition has 18,519 total signers.

You can post a response for us to pass along to all petition signers by clicking here: http://petitions.moveon.org/target_talkback.html?tt=tt-115677-custom-75514-20261130-EcSFxL

The petition states:

"Stop Rocky Mountain Power from Killing Residential Solar in Utah Over the last year, Rocky Mountain Power's sister company killed 99% of residential solar in Nevada. Now, Rocky Mountain Power is trying to do the same thing in Utah, by asking the Utah Public Service Commission to approve one of the most aggressive, anti-consumer, anti-competitive, and anti-solar proposals ever brought forth by a utility in the United States. The Commission is required to study the costs and benefits of residential solar in Utah. Most states have found that residential solar provides a net benefit to everyone, not just solar customers. Rocky Mountain Power ignores the full benefits and demonstrated cost-savings that they and all Utahns receive from residential solar. Utah deserves an open and transparent cost-benefit study. We call on Governor Herbert, the Utah Legislature, the Utah Public Service Commission, the Utah Division of Public Utilities, and the Utah Office of Consumer Services to reject Rocky Mountain Power's proposal. We ask the Commission to conduct a robust and fair cost-benefit study so that Utah homeowners can continue to invest in solar and energy independence."

To download a PDF file of all your constituents who have signed the petition, including their addresses, click this link: http://petitions.moveon.org/deliver_pdf.html?job_id=1902084&target_type=custom&target_id=75514

To download a CSV file of all of your constituents who have signed the petition, including their addresses, click this link: http://petitions.moveon.org/deliver_pdf.html?job_id=1902084&target_type=custom&target_id=75514&csv=1

Thank you.

—Ryan Evans

If you have any other questions, please email petitions@moveon.org.

The links to download the petition as a PDF and to respond to all of your constituents will remain available for the next 14 days.

This email was sent through MoveOn's petition website, a free service that allows anyone to set up their own online petition and share it with friends. MoveOn does not endorse the contents of petitions posted on our public petition website. If you don't want to receive further emails updating you on how many people have signed this petition, click here: http://petitions.moveon.org/delivery_unsub.html?e=Ly_sxWisHzEtWsNiXJK703BzY0B1dGFoLmdvdg--&petition_id=115677.



PublicService Commission <psc@utah.gov>

Fwd: Solar tariff

1 message

Carol Revelt <crevelt@utah.gov>
To: PublicService Commission <psc@utah.gov>

Wed, Nov 30, 2016 at 7:30 AM

----- Forwarded message -----

From: **Linda Sorensen** <lsorensen03@yahoo.com>

Date: Tue, Nov 29, 2016 at 10:52 PM

Subject: Solar tariff

To: crevelt@utah.gov

>
> Hello Ms. Revelt,
>
> I understand that you are the person to talk to regarding the proposed increase in metering costs for solar customers through Rocky Mountain power. As an existing solar customer I want to voice my opposition to this increase.
>
> We had solar panels installed on our roof in 2015. Our motivation for getting solar panels was two fold. First we wanted to be environmentally conscious and second we wanted to reduce our energy bill. This metering increase will make these goals impossible for new customers!
>
> Discouraging new solar customers will stall any progress we are making as a state toward clean air and decreased reliance on fossil fuels. Our goal as a family is to purchase an electric vehicle that we can power through our solar panels and further decrease our carbon footprint. As a state we should be increasing incentives for clean energy solutions. It seems we are doing the opposite in this case! Discouraging clean energy and supporting the power company.
>
> Please don't allow this increase to take effect! Help us to become a clean energy state and continue making progress toward clean air!
>
> Thank you,
> Linda Sorensen
>
> Sent from my iPhone



PublicService Commission <psc@utah.gov>

Fwd: OPPOSE Changes to Net-metering Rates

1 message

Carol Revelt <crevelt@utah.gov>
To: PublicService Commission <psc@utah.gov>

Wed, Nov 30, 2016 at 7:30 AM

----- Forwarded message -----

From: **Brogan L Fullmer** <broganfullmer@gmail.com>
Date: Tue, Nov 29, 2016 at 11:15 PM
Subject: OPPOSE Changes to Net-metering Rates
To: crevelt@utah.gov, jdalton@utah.gov, jmaio@utah.gov
Cc: Lyndi Raddatz <lyndi.raddatz@gmail.com>, thefulls@comcast.net

Commissioners,

Thank you for taking the time to hear our concerns regarding Rocky Mountain Power's proposed rate hike against net-metering customers. As lifelong Utahns, my wife and I, as well as all of our extended family strongly oppose this proposed rate hike. While we recognize the need to charge users of the electrical infrastructure fair rates, we view Mountain Power's extensive increase in fees against solar users as extremely unfair and especially harmful to consumers.

We ask that as commissioners you consider the already marginal savings or break-even point for most solar users. My wife and I still pay an electrical bill to Rocky Mountain Power each month, despite having 25 solar panels, an energy saving smart thermostat, energy conservation devices and appliances in our home, and a fairly moderate-sized home.

Contrary to Rocky Mountain Power's claims, we do not make money off of our attempts to live more environmentally friendly and energy-conscious lifestyles. Instead, we pay an additional \$2-\$10 on average each month in fees to Rocky Mountain Power, compared to traditional metered use. These fees are also in addition to the cost of leasing or buying a solar panel system. Together, these fees and expenses are already cost prohibitive for most Utahns. My wife and I are willing to pay this marginal difference because it is an actionable step to improve Utah's deplorable air quality.

As you are undoubtedly aware, Salt Lake City's air pollution is the sixth worst in the nation¹, followed by Logan. Utah's air quality is so harmful it often degrades to some of the most toxic in the entire world, according to the American Lung Association. Today, Utah's air is worse than major cities such as Los Angeles, Pittsburgh, and New York². Utahns are forced to breathe air receiving failing 'F' grades in 11 of Utah's 14 counties, with only three counties receiving 'Cs'

We ask that as commissioners you weigh and consider the tremendous economic, environmental, and medical benefits of improved air quality thanks to the use of solar energy in Utah. In addition to saving Utah's money which would be immediately lost to tourist dollars, clean up environmental hazards, and treat illnesses caused by air pollution (including heart disease, autism, and increased chance of suicide), the solar industry within the state of Utah is a major employer, creator, and driver of innovation. Solar is precisely the type of industry Utah's motto embodies.

We are shocked to learn that the Rocky Mountain Power seeks to sunset and eliminate incentives to buy and lease renewable solar energy systems. We are further outraged that Rocky Mountain Power describes these efforts as grants.

Utah consumers, while omitting the tremendous economic, environmental, and medical costs which will be forced on them. This anti-business, anti-innovation rate hike against solar companies is antithetical to the values and interests of our citizens.

The Utah Public Service Commission must take any and all steps possible and necessary to preserve, protect, and support solar industry incentives.

Please OPPOSE Rocky Mountain Power's rate increase requests and adjustments to net-metering agreements. Please SUPPORT legislation and the expansion of rebates, tax incentives for solar infrastructure development in Utah.

It's the commonsense, smart business decision to make.

Brogan & Melinda Fullmer

[801-499-7586](tel:801-499-7586)

1 "State of the Air® 2016, American Lung Association, pg. 14

2 Ibid, pg. 14

3 Ibid, pg. 144

4 "2015 Annual Report", Utah Division of Air Quality, pg. 23-25



PublicService Commission <psc@utah.gov>

Solar Net Metering Rate Change Proposal

1 message

Jeffrey Louden <jeffreydeanlouden@gmail.com>

Wed, Nov 30, 2016 at 8:08 AM

To: psc@utah.gov

To: Utah Public Service Commission

Re: Proposed Solar Rate Change

Date: 11/30/2016

Dear People,

I strongly urge you to deny the proposed rate change regarding net metered solar with Rocky Mtn Power. Solar allows us to reduce our carbon footprint and to forego the development of more coal or gas based power plants. But its real value is the diversification and decentralization of power generation. Like the rest of the country, it would be great, if Utah, with its abundant insolation, would use solar for the benefit of the people. Perhaps the PSC could direct RMP to actively encourage and subsidize solar energy. There is no loser in this.

Sincerely,

Jeffrey Louden
8808 North Cove Dr
Park City, UT 84098

[435 615 6595](tel:4356156595)



PublicService Commission <psc@utah.gov>

Fwd: Rocky Mountain Powers request to boost solar fees---NO!

1 message

Carol Revelt <crevelt@utah.gov>
To: PublicService Commission <psc@utah.gov>

Wed, Nov 30, 2016 at 8:35 AM

----- Forwarded message -----

From: **Lee Binns** <lakebinns15@gmail.com>
Date: Wed, Nov 30, 2016 at 8:29 AM
Subject: Rocky Mountain Powers request to boost solar fees---NO!
To: crevelt@utah.gov

"Rocky Mountain Power quietly submitted a request to penalize Utah residents who are using or who wish to use solar power for their homes. Without public input or hearing they are trying to make the cost of solar unattractive for those who care about the formerly clean air we breath and the environment..

Solar power account for about 1 percent of the total power generated in Utah and currently employs over 3,300 folks. Those who wish to improve the environment and help clean our air should not be penalized.

I urge our elected officials and public servants to NOT allow this rate increase and restrictions".

R.M.P. should change all their coal fired power plants to natural gas and get out of the solar power business, unless they can make it less expensive than roof mounted solar power for our homes.

Please advise.

Thank you.

Lee and Mary Lou Binns
2812 Sweet Basil South
Taylorsville, Utah 84129

best e-mail: mlb967@centurylink.net

801-808-1536cell
801-967-5492home

Rocky Mtn. Power account #21945776-001 3 (since 1974)



PublicService Commission <psc@utah.gov>

Solar panels

1 message

Barbara Taylor <bjbtaylor1@gmail.com>

Wed, Nov 30, 2016 at 8:48 AM

To: psc@utah.gov

To the three members of the Public Service Commission:

Please do not let Rocky Mountain Power charge more for rooftop solar panels. As you know, air pollution is a huge problem for our state and home owners who convert to solar are trying to combat climate change and air pollution. Solar power is the power of the future and those who remain on fossil fuel will eventually have to convert, or they will be on the wrong side of history. It is only a matter of time before all the power companies will have to convert to solar or wind and they will regret not converting sooner. Please support home owners who have solar panels.

Thank you,
Barbara Taylor
2040 Emerson Avenue
Salt Lake City, UT 84108

Sent from my iPad



PublicService Commission <psc@utah.gov>

Rocky Mtn Power Proposal re: rooftop solar

1 message

bntucker@comcast.net <bntucker@comcast.net>

Wed, Nov 30, 2016 at 9:25 AM

To: psc@utah.gov

To whom it may concern:

We wish to express our displeasure at RMP's proposals to add fees that penalize households with rooftop solar. This is a blatant attempt to discourage newer energy technologies and make its cost prohibitive. We have rooftop solar not only to reduce monthly cost, but also to contribute to cleaner air. If the population of Utah, mostly on the Wasatch Front, is expected to increase exponentially in the next two decades, it would be wise to encourage rooftop. It benefits everyone and will slow the need to build a new power plant (or more). Coal is the past, solar is the future. RMP makes enormous amounts of money so promoting solar will not beggar them. This new industry has created thousands of new jobs that the Governor can brag about. Please do NOT sign off RMP's plan. We already pay our fair share and all the benefits cannot be quantified until peripheral benefits are considered and tallied in with the whole picture.

Brent & Nancy Tucker
Cottonwood Heights, UT



PublicService Commission <psc@utah.gov>

Rooftop Solar Proposal from RMP

1 message

bntucker@comcast.net <bntucker@comcast.net>

Wed, Nov 30, 2016 at 9:29 AM

To: psc@utah.gov

Please deny RMP's request for increasing fees on those of us who invested in rooftop solar this year. This is the technology of the future, has created thousands of new jobs, and contributes to cleaner air in a place that needs all the help it can get from inversions and pollutants in the air. Rocky Mtn makes lots of money and going after those of us who made the investment is troublesome at best. We pay our fair share and selling extra power is a benefit to them. No one should be penalized for embracing current technology.

B Tucker

Salt Lake City



PublicService Commission <psc@utah.gov>

solar net metering

1 message

Heather Keenan <heather.keenan@hsc.utah.edu>

Wed, Nov 30, 2016 at 10:24 AM

To: "psc@utah.gov" <psc@utah.gov>

Dear Sir or Madam -

I would like to express my opposition to the planned increased rates for home solar users.

Air quality is a huge problem in Salt Lake City and one potential way to help alleviate this is through the use of clean energy.

By making solar costs more unpredictably for home owners, you dampen the possibility of more home owners installing solar which will lead to an increased need for more fossil fuels and a resultant increase in air pollution.

Thank you,

Heather Keenan

403 E 7th Avenue
Salt Lake City, UT 84103



PublicService Commission <psc@utah.gov>

Fwd: Roof-Top Solar

1 message

Carol Revelt <crevelt@utah.gov>
To: PublicService Commission <psc@utah.gov>

Wed, Nov 30, 2016 at 1:54 PM

----- Forwarded message -----

From: **Miriah Sorenson** <miriahrr@hotmail.com>
Date: Wed, Nov 30, 2016 at 1:52 PM
Subject: Roof-Top Solar
To: "crevelt@utah.gov" <crevelt@utah.gov>

Ms. Revelt,

I am writing to express my concern about the possible rate discrepancy that may occur between net-metered and non-net-metered customers of PacifiCorp. I'm not sure if you are the person to submit this concern to. If not, please let me know who I should contact. It sounds like right now the Public Service Commission has directed PacifiCorp to compare costs in order to possibly come up with new rates for net-metered customers. I would hope that the Public Service Commission carefully examines those costs, and not ignore the long-term costs that PacifiCorp saves by having customers produce some of their own energy needs through roof-top solar. This private generation prevents PacifiCorp from having to find new sources of distributed energy as the population of Utah grows. The savings from not having to develop new projects or sign long-term contracts with other generators would be a benefit to all customers, not just net-metered customers. This benefit is far from speculative. PacifiCorp likely has all sorts of long-term projections in order to anticipate future needs. It is not clear why this issue should be treated differently than energy efficiency measures. Finally, the benefits to the community that come from roof-top solar efforts are tremendous. There are numerous jobs and economic benefits to this industry. And, the reduction in pollution and emissions is a long-term good for all of us that should not be overlooked.

I want to urge the Public Service Commission to reject any rate increase for net-metered customers.

Thank you for your time and attention.

Regards,

Miriah R. Elliott

Ivins, Utah



Gary Widerburg <gwiderburg@utah.gov>

Public Service Commission

6 messages

constituentservices@utah.gov <constituentservices@utah.gov>

Wed, Nov 30, 2016 at 3:31 PM

To: gwiderburg@utah.gov

November 30, 2016

Cain, Tyler

You have been assigned to reply to the following issue:

Constituent: Beller, Stephanie**Constituent Address:**

Stephanie Beller

UT

Constituent Email: Sb1111gw@gmail.com**Mobile #:****Home #:****Office #:****Subject:** Public Service Commission

Request (Closed): Dear Governor Herbert, On November 9, Rocky Mountain Power filed a request before the Public Service Commission to raise rates on rooftop systems. The fees are among the highest proposed by any utility around the nation on rooftop solar customers. If imposed, the fees would effectively end the growth of the rooftop solar and devastate the solar industry in Utah. The solar industry provides almost 4000 jobs in the state and hundreds of millions of dollars in economic activity. All of which will be negatively affected if these fees are put into place. You only have to look toward Nevada to see the effect. Their commission imposed outrageous fees on owners and overnight hundreds of solar industry jobs were lost. Utah prides itself as a economic development state. Your office has worked hard to cultivate growth and it has paid off. If these fees are imposed one of the fastest growing industries in the state will be greatly harmed. Your leadership on this issue is critical. Thank you for your time.

Thank you.

Constituent Services.

constituentservices@utah.gov <constituentservices@utah.gov>

Wed, Nov 30, 2016 at 3:34 PM

To: gwiderburg@utah.gov

November 30, 2016

Cain, Tyler

You have been assigned to reply to the following issue:

Constituent: Zurick, Jennifer**Constituent Address:**

Mobile #:

Home #:

Office #:

Subject: Public Service Commission

Request (Open): Dear Governor Herbert, On November 9, Rocky Mountain Power filed a request before the Public Service Commission to raise rates on rooftop systems. The fees are among the highest proposed by any utility around the nation on rooftop solar customers. If imposed, the fees would effectively end the growth of the rooftop solar and devastate the solar industry in Utah. The solar industry provides almost 4000 jobs in the state and hundreds of millions of dollars in economic activity. All of which will be negatively affected if these fees are put into place. You only have to look toward Nevada to see the effect. Their commission imposed outrageous fees on owners and overnight hundreds of solar industry jobs were lost. Utah prides itself as a economic development state. Your office has worked hard to cultivate growth and it has paid off. If these fees are imposed one of the fastest growing industries in the state will be greatly harmed. Your leadership on this issue is critical. Thank you for your time.

Thank you.

Constituent Services.

constituentservices@utah.gov <constituentservices@utah.gov>
To: gwiderburg@utah.gov

Wed, Nov 30, 2016 at 4:36 PM

November 30, 2016

Winegar, Celeste

You have been assigned to reply to the following issue:

Constituent: Mower, Heidi

Constituent Address:
Heidi Mower

UT

Constituent Email: fairyprincess11@comcast.net

[Quoted text hidden]

