

Jennifer Joy - Comments in regards to Docket 07-035-T14 and Rocky Mountain Power's Schedule 107-Solar Incentive Program 2009 Annual Report

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To: <jwatts@utah.gov>
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Subject: Comments in regards to Docket 07-035-T14 and Rocky Mountain Power's Schedule 107-Solar Incentive Program 2009 Annual Report

UTAH PUBLIC
SERVICE COMMISSION

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Dear Commissioners,

The Utah Solar Energy Association submits these Comments in response to the April 20, 2010 Request for Comments issued by the Public Service Commission (the "Commission") in regards to Docket 07-035-T14 and Rocky Mountain Power's Schedule 107-Solar Incentive Program 2009 Annual Report. We appreciate the Commission providing this opportunity to comment on this important issue.

The Utah Solar Energy Association (UtSEA) is the non-profit 501(c)3 organization representing the solar installer industry in Utah, including over 23 solar installation business members. After reviewing Rocky Mountain Power's Schedule 107-Solar Incentive Program 2009 Annual Report we would like to initially comment on one area in particular.

As the association made up of primarily solar installers and representing the growth of the solar installation industry in Utah, the Utah Solar Energy Association feels the "Key Findings from 2009, #1 Installed System Costs" require further scrutiny and analysis. The report states that average installed cost in 2008 and 2009 was \$9.73 and \$9.35 respectively under the RMP rebate program. However, the Utah Solar Energy Association and its member solar installation companies saw average system costs in 2009 between \$7.50 and \$8.00 per watt installed for basic rooftop grid-tied systems, and 2010 prices are currently closer to \$6.00-\$6.50 per watt installed for the same basic rooftop grid-tied systems. The report listed the costs of each system and in the summary highlighted the highest cost system at \$27.90/watt and the lowest cost system at \$3.23/watt. It explained the cost of each system, but only identified the lowest cost system as an exception or statistical outlier. In reviewing the list of systems and their costs there are eight or more systems with unusually high installed costs, but only one system with a relatively low installed system cost. This would demonstrate the use of an artificially high average installed cost for solar in Utah in the 2009 Annual Report. Therefore, more attention needs to be given to the methodology and accuracy of measuring and reporting installed system costs in Utah in order to better understand the true cost of solar and its potential costs and benefits to the rate payer in Utah.

In addition, the Utah Solar Energy Association agrees that better collection of data from participating home owners is crucial to tracking the success of the program. However, requiring the installation of additional meters at all participating sites will increase the costs such that they will outweigh the benefits. Installation of these meters in 5-10% of the systems would provide sufficient data to understand the impact and benefits of solar in Utah as site data does not differ significantly from site to site. This would accomplish the same goal of capturing important data that can help Rocky Mountain Power better assess the potential impact of solar on Peak Demand, etc without unnecessarily increasing costs.

The Utah Solar Energy Association feels this pilot program has demonstrated the existing and growing demand for utility programs and incentives that enable the adoption of solar in Utah, and we hope the Commission will evaluate the need to expand this current program in order to provide opportunities for more rate payers to invest in solar energy in Utah.

We request more transparency and an open public process to review the pilot program.

We again want to thank the Commission for reviewing this important issue, and look forward to further participation in this discussion.

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