

July 30, 2014

Utah Public Service Commission  
160 East 300 South  
Salt Lake City UT 84114

UTAH PUBLIC  
SERVICE COMMISSION

2014 AUG -4 A 11: 53

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Subject: Public Comments, Docket No. 13-035-184, Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates

Dear Commissioners:

We are in the process of installing solar panels and are writing to oppose Rocky Mountain Power's request for a monthly fee for net metering customers. We'll try not to duplicate arguments already presented.

We'd like to address the issue of accounting. Specifically, RMP wants to account for some aspects of solar power generation but not others. It can't have it both ways.

To give an example, some friends of ours generate more power with their solar panels than they use. Rather than allowing them to carry forward that credit to a new year, RMP sweeps (zeroes out) their account at the end of March, in effect taking those power credits without compensation and without accounting for them.

Second, RMP doesn't want to account for the benefits of renewable energy on lowering pollution in the environment or helping reduce global warming, saying they can't be measured. We know, intuitively, that solar generation does benefit the environment. Just because RMP hasn't developed the matrices to measure that benefit doesn't give them the right to dismiss accounting for it.

Rocky Mountain Power also claims that a portion of the power generated by solar panels comes at inappropriate times, not at night when power needs go up. But other, forward-thinking energy companies are exploring ideas like using excess power generation during daytime to push "weighted railcars" up an incline. Then, when power is needed at night, they can let the cars roll downhill and generate kinetic energy. The real problem is that RMP shows a lack of creativity. How should that be accounted for?

On the other hand, Rocky Mountain Power does want the public to account for its Blue Skies program. But when you look closely at the program and get beyond RMP tooting its own horn, you'll note that Blue Skies funds come from conscientious ratepayers like us who want to do the right thing and stimulate renewable energy production. RMP solicits those Blue Skies monies from its ratepayers, dispensing them to renewable energy projects, then takes the credit. We call that self-serving,

cynical accounting. Perhaps a net metering fee should be subtracted from donations to Blue Skies.

The core problem facing RMP is that it sees its business model crumbling, faster than anticipated. For years it has shown lukewarm interest in promoting renewable energy, largely because it is heavily invested in fossil fuel generation, especially coal. Now it wants the public, and specifically individual solar power generators, to pay for its lack of foresight. In effect, it wants to socialize its losses, while it privatizes its profits. But instead of taxing solar power customers, thus dissuading people from investing in solar panels, RMP should ask their stockholders to pay for the lack of foresight demonstrated by company officers. Berkshire Hathaway has enough money to reimburse RMP's losses until it draws up a business model that accounts for the contributions net metering customers are providing to our community in the 21<sup>st</sup> Century.

Sincerely,

Handwritten signature of Margaret Denton in cursive script.

Craig and Margaret Denton

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Cottonwood Heights, UT