



Rocky Mountain Power's Proposed Tax On Solar Power

1 message

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To: psc@utah.gov

Cc: Mike Rossetti <mike_rossetti@ucare.us.org>

Members of the PSC,

Rocky Mountain Power is proposing an across-the-board increase of 2.6¢ per kWh for all residential net metering customers, regardless of how much excess electricity they generate.

In 257444 Exhibit A to Steward Rebuttal Test - Copy of 5_Exhibit_RMP_JRS_1R 6-26-2014.xlsx is the figure '13,012,995'. The title of this line is "Net Metering kWh".

This number, 13,012,995, is the total number of kWhs coming into a solar customer's home. This number has nothing to do with excess generation. In fact, even if every single solar customer disconnected their panels, they would still be considered net metering customers and they would still be paying that average 2.6¢ per kWh extra in their bills. In this scenario, the solar customer would essentially be using the system exactly like a non-solar customer, but they would be paying 2.6¢ extra. Actual excess production, the one thing Rocky Mountain Power claims impacts their system, is not actually being taken into consideration using this "straightforward calculation".

Rocky Mountain Power fails to explain why they are using what looks to be 'gross' consumption while making this calculation. Rather, they keep stating that the solar customer is not paying for the actual use of the system when they redeem the credits for excess generation. Why doesn't Rocky Mountain Power use a number that represents excess kWhs, i.e., "net production"? In fact, that number happens to be somewhere in the range of 2,500,000 kWh, or about 20% of "gross consumption". If fixed cost recovery is at the heart of this, and the fixed costs not being recovered are due to the 'credit' given the solar customer, why isn't it the credited excess or "net production" kWh being used in the calculation of shifted costs?

Because of this blatant flaw, Rocky Mountain Power's "straightforward calculation" makes no sense. If this flawed calculation was the only problem with Rocky Mountain Power's proposal, it would mean that the \$4.65 would be more properly calculated to be 92¢ per bill. assuming that a flat fee was fair, and assuming that this 92¢ was not already being recovered from the neighbor who consumes the excess *without* using the grid.

I respectfully urge you to reject Rocky Mountain Power's proposal. Not only are their numbers wrong, their flat fee proposal is simply a smoke screen to obscure their real intention of imposing a new rate schedule on net metering customers—something that would be very difficult to do in an above-board manner with the Commission.

Thank you for your consideration.

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