

Docket No:
14-035-114

To: Utah Public Service Commission
160 East 300 South
Salt Lake City, Utah 84114
From: Stanley T. Holmes
stholmes3@xmission.com
Re: Docket No. 14-035-114, and Notice of Technical Conference

UTAH PUBLIC
SERVICE COMMISSION

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October 9, 2014

Dear Commissioners,

Thank you for deciding, on August 29th, that "further study and analysis regarding the costs and benefits associated with the net metering program is required" before Rocky Mountain Power (RMP)-PacifiCorp's solar surcharge request will again be considered. Your thorough examination of the full range of impacts would provide the public, policy-makers, and the utility an evidentiary framework for making prudent choices that are in everyone's best interests. This is an opportune moment for the Commission to identify and clarify facts in the intensifying debate over the full value of solar energy generation.

I understand that the technical conference you have scheduled for November 5th will be the first meeting at which all interested parties can discuss your plan for the solar net metering costs and benefits inquiry. I have several questions sparked by your notice of the conference that I would very much appreciate having answered prior to the November 5th meeting. There may be other interested members of the general public who would also appreciate this information.

Your stated purpose of the November 5th conference is "for PacifiCorp to present its plan for performing a load research study focused on residential net metered customers, and its schedule for the study's completion." Since PacifiCorp has a vested interest in the outcome of this docket (14-035-114), I would like to know whether you have assigned a neutral party to monitor PacifiCorp's data collection or if your plan is to wait until PacifiCorp presents a formative report that can be commented upon by parties not designated as primary investigators by the PSC. If the latter option is your plan, will the November 5th meeting reveal how and when all the data PacifiCorp is using will be identified and made available to other interested parties and the general public?

The purpose of the November 5th meeting is to consider load research only. Have you scheduled conferences to address other research topics relevant to the net metering inquiry, or will that be discussed on Nov. 5th as well? And, is it your plan to have all tracks of the inquiry completed at the same time? For your consideration of relevant costs-vs.-benefits factors both internal and external to the grid, I have attached to this correspondence a recent study by Synapse Energy Economics, Inc. along with a national and Utah-specific energy report by the National Association for the Advancement of Colored People (NAACP). Websites for these documents appear at the end of this letter.

Synapse's "Net Metering in Mississippi: Costs, Benefits, and Policy Considerations" looks at "avoided costs" made possible by solar generation within the grid system. The NAACP's "Just Energy Policies: Reducing Pollution and Creating Jobs" focuses on the human health, economic, and environmental costs of fossil fuel combustion, and how the use of solar and other renewables helps avoid the social costs of carbon. Both of these reports buttress the argument that the traditional utility and regulatory

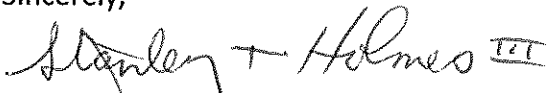
perspectives on what count as "avoided costs" have been, and remain, limited to parameters set by a carbon-centric business model. I would appreciate your including these two documents as exhibits in Docket #14-035-114.

Your notice indicates that PacifiCorp's proposed study and schedule will only address the residential sector of solar net metering. This is not surprising, since RMP-PacifiCorp's preference in the previous rate docket (13-035-184) was to focus solely on residential. The current docket, however, calls for study and analysis of "the net metering program", which includes non-residential and commercial in addition to residential. Would you please confirm that the Commission intends to have the entire net metering program studied and analyzed?

On the chance that the Commission is still undecided on the scope of its solar net metering inquiry, I suggest that a comprehensive study should include the net metering program in its entirety since the inclusion of all net metering customers would allow stronger conclusions by increasing the size of the data set beyond the relatively small residential sector. And, inasmuch as RMP-PacifiCorp hinted in its testimony to Docket 13-035-184 that a rate increase for non-residential and commercial customers may be requested in the near future, it also makes sense to research all net metering program sectors now. Finally, there is the matter of S.B. 208, which did not specify that the solar costs-vs.-benefits inquiry be limited to residential customers only.

Thanks in advance for undertaking a full and fair analysis of the costs and benefits of solar net metering. You are to be commended for launching a much-needed initiative that reflects public service of the highest order.

Sincerely,



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Synapse report:

[http://www.psc.state.ms.us/InsiteConnect/InSiteView.aspx?model=INSITE_CONNECT&queue=CTS_ARC HIVEQ&docid=337867](http://www.psc.state.ms.us/InsiteConnect/InSiteView.aspx?model=INSITE_CONNECT&queue=CTS_ARC_HIVEQ&docid=337867)

NAACP report:

http://naacp.3cdn.net/65ceef04a8572daf81_tym6blqfc.pdf