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**Docket #14-035-114**

1 message

**Melanie Florence** <melanie.florence@gmail.com>

Sun, Nov 16, 2014 at 4:55 PM

To: psc@utah.gov

Dear PSC,

I am a residential solar net-metering customer who opposes Rocky Mountain Power's second proposal to charge additional monthly fees. In my opinion, Rocky Mountain Power needs to change its business plan so that it can accommodate the inevitable increase use of residential solar power instead of charging fees to net-metering customers. I oppose this new effort because:

1. The load research component of the costs-benefits analysis should include ALL net metering customers -- residential and commercial/institutional-- which will provide more data to assess solar NEM impacts and value. The study should track NEM and non-NEM customers' energy demand at the same time intervals. The sample sets should be broadened to include geophysical characteristics that would affect energy input and output in different areas of RMP's Utah grid. For example, I live in southern Utah, which would have a different load demand than northern Utah. I also have a ground source geothermal heat pump instead of a furnace, which increases my electricity demand in the winter while most people are lessening demand by , using natural gas and other heat sources.
2. Any Rocky Mountain Power load research study will not, in itself, sufficiently address the need for a thorough costs-benefits analysis of its net metering program. For the costs-benefits study to be valid, it must include the full range of "avoided costs" that solar NEM contributes to the electrical system, such as: less carbon fuel burned, less need for more power plants, fewer transmission costs and less energy lost on transmission lines, reduced EPA compliance costs, and less vulnerability to fossil fuel price fluctuations.
3. The PSC should acknowledge and consider solar's value in offsetting the so-called "externalized" costs of burning fossil fuels to produce electricity. These real-world health care, economic, and environmental costs of burning carbon are shifted from Rocky Mountain Power's financial calculations to our families and communities.
4. The PSC should set a schedule of technical conferences to address these additional cost-benefit research items as soon as possible. Investigation of avoided cost factors should not be allowed to fall behind as Rocky Mountain Power moves forward with load research.
5. Rocky Mountain Power's research and analysis should be verified independently to make sure it produces legitimate results. Customers opposed to additional fees for net-metering do not have the time, expertise and resources needed to verify information given by Rocky Mountain Power to make sure it is correct. An independent third-party that objectively monitors all aspects of the solar NEM costs-benefits would ensure accurate and thorough results.

Thank you,  
Melanie Florence