



PublicService Commission &lt;psc@utah.gov&gt;

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**Docket #14-35-114**

1 message

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**Jay Vestal** <jayvestal@msn.com>

Mon, Nov 17, 2014 at 9:43 AM

To: psc@utah.gov

Dear Commissioners:

It appears to me and should be clear to you that Rocky Mountain Power should not be trusted to do an objective research and analysis of the cost and benefits of net metered solar without independent oversight. The PSC should engage a reputable, independent 3rd party to objectively monitor all aspects of the NEM investigation so that results are impartially presented. This function should not be left to the Division of Public Utilities or the Office of Consumer Services, as these entities have already demonstrated bias favoring RMP in its previous solar surcharge request.

The current RMP proposal is not adequate to a thorough examination of load research. That 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.

Also, any RMP load research study will not sufficiently address the need for a thorough costs-benefits analysis of RMP's 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, i.e. 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.

Lastly, 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 RMP's financial calculations to our families and communities. RMP assumes it will not have to take these costs into account, because the PSC has never made it do so.

I would appreciate your factoring these recommendations into your decision.

Regards,

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