



PublicService Commission <psc@utah.gov>

Solar Docket, #14-035-114

1 message

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To: psc@utah.gov

Dear Commissioners,

I have been following RMP's attempts to implement a fee for net metering customers with great interest, and great concern. You, as the PSC, instructed them to do a comprehensive analysis of *all* benefits and costs associated with net metering. From what I understand, their comprehensive analysis involves nothing more than a simple load study using a small sample of customers.

I would love to participate in the study, to better understand what's being tracked and see the data itself, but unfortunately I was not given that opportunity. As I understand it, the study involves measuring the excess electricity generating by net meter homes and fed onto the grid (or, to nearby neighbors) as well as the electricity pulled from the grid and mapping it out by time of day. It will probably emphasize RMP's truncated peak hours (rather than the peak hours defined by "Time of Day" billing customers). My understanding is that it would *not* measure electricity generated that is used immediately by the net meter customer, thus avoiding the need to pull that power from the grid. This is just one significant benefit that is invisible to this study.

The analysis *cannot* simply be about grid load. Otherwise, those using huge amounts of power need to be charged a fee for causing extra strain on the grid, and on the other end of the spectrum, those using very little electricity need to be charged a fee for failing to pay their "fair share" of grid maintenance. RMP is using both arguments against net meter customers, and since their alleged costs go way beyond how much net meter customers pull from the grid or add to it during peak hours, so should their analysis.

There are so many factors that this study fails to address. RMP has claimed that feeding small amounts of electricity from net meter customers to their neighbors results in increased "wear and tear" on the grid, and requires more frequent maintenance. Where is the study or the prior data showing that alleged cost? Where is the study comparing transmission costs from a power plant vs from a net meter customer?

Also, there are numerous external benefits that, while difficult to quantify, are not impossible to estimate. These environmental benefits are real and should not be ignored in a comprehensive cost/benefit analysis.

I'm not sure why it seems that no unbiased third party was required when RMP was asked to do further analysis, when their declared intention from the beginning has been to impose a new fee, not to find out if they should. They have already decided that this is the best action for them, and so any analysis they do without third party scrutiny is suspect. This has to be comprehensive, and I do not believe that will happen without third party oversight.

Please take my suggestions into consideration as you give RMP further direction on their mandated analysis.

Thank you
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