



Docket 14-035-114

1 message

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Tue, Jan 20, 2015 at 10:53 PM

To: psc@utah.gov

Dear Commissioners,

I applaud you for taking the higher road and denying Rocky Mountain Power's request to impose a net metering fee last year, in favor of a comprehensive analysis of both the costs and benefits of renewable energy within Utah's energy portfolio. I anticipate seeing the data presented in response to the ruling and the proposed analysis. Your decision may establish precedence for other states to follow in considering the stake of their own futures.

By definition, non-renewable energy sources are finite, implying costs will rise over time, unless their use is curtailed. Distributed generation and renewable energy initiatives certainly require an investment, but attempts to forestall the development of renewable energy sources merely delay the inevitable. In many states, solar is already beyond grid parity, without government tax incentives, and I empathize with RMP, but that doesn't mean I agree that their solution to their difficulty is the best for all involved. Not even themselves. Requesting net metering customers to pay additional fees for making the transition sooner, rather than later, as will eventually happen, without clear justification and planning, is to penalize the drivers of progress.

In considering the request to levy a net metering fee, a full analysis covering all facets of the costs of and benefits of fossil fuels and renewable energy sources must be conducted. It should cover:

Both residential and non residential customers.

Short term and long term impacts. We aren't talking about a few years or even decades. We are talking about hundreds of years into the future.

Environmental impacts of coal, and advantages of renewables. We stopped allowing dumping in our rivers long ago, and have placed a bandaid on the problems associated with fossil fuels. Much more can and will be done, but only if these costs and benefits are recognized for what they are.

Public health impacts and benefits of the same. These are estimated in the hundreds of billions. Divide that among the user base and ask RMP to cover it - or compare it against the alleged costs of net metering to allow clean energy to be integrated. Beyond primary medical costs, what are the secondary losses due to lost work time and lower mental aptitudes from pollution induced illnesses?

Security risks. Centralized power plants may achieve economies of scale, but they are more vulnerable to terrorist attacks and natural disasters. A distributed, modular, system may cost more to implement, but is far more reliable and safer if properly designed. What is the economic liability we face if a power plant were unexpectedly taken out. How does that compare with the costs of implementing a more robust distributed generation system?

All Stake Holders. Rocky mountain power and their customers aren't the only ones affected by this. This is to say, just because public health isn't the explicitly stated responsibility of Rocky Mountain Power, doesn't mean that their actions aren't imposing costs on health insurance agencies or their customers, agricultural professionals, or their customers, tourists, or the businesses that support them. All of these classes and more are negatively impacted by the environmental, health, and security impacts mentioned above.

My personal feeling is that, once all the above are considered, if a fee is to be imposed, RMP needs first to clearly substantiate what that fee will be invested toward to further the development of a distributed generation grid (i.e. energy storage), that is both required to enable net metering, and is not needed by traditional customers. Then, who pays that fee should be determined by asking who really benefits. The advantages of net metering go far beyond that of the individual net metering customers, most of whom invested substantial effort to make the transition, and may be more deserving of the savings than the less initiated traditional customer, by merit of their foresight and hard work. The costs of developing distributed generation should be born by all those who benefit, which is effectively the entire population. Simply stating that NM customers aren't paying their fair share is not adequate justification.

This is a lot to consider. You are in a position called to serve the public interest, not just that of the utility, and have done well in requesting a more detailed analysis of the matter at hand. Ultimately, the thing I hope you consider most is the world you choose to leave behind to your children, and let that govern your decision about what to include in the analysis, and the forthcoming analysis thereof.

Thank you for your consideration and attention to our future.

Sincerely,

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