



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

## Solar / Net Metering Issues and comments

1 message

RJ Mendenhall &lt;rjm@premsoft.com&gt;

Thu, Oct 8, 2015 at 4:27 PM

To: "psc@utah.gov" &lt;psc@utah.gov&gt;

Hi, My name is RJ Mendenhall and there are a few things I would like to mention about the way solar is being handled currently in Utah.

1. Once per year any unused credits are wiped out. This does not seem fair. The excess power created by the solar panels was used by another rocky mountain power customer who was billed for that power. RMP profited at the retail rate at no expense to them. Think of it this way. You work in a factory creating widgets. (a widget is a credit in this example) You get paid by how many widgets you make. You are required to make 10 per day. Because you are a hard worker you make 11 per day. At the end of the month you have 30 widgets that can be sold by the company you worked for. Instead of paying you for those widgets they sold them and kept the profits. This sounds like theft to me.

**Suggestion:** since RMP benefitted from the generation of this excess power I would like to see the producer of that power be compensated. If RMP needed excess power and purchased it on the open market they would have paid a wholesale price for that power. I believe Solar customers should be compensated at the very least the wholesale rate for any unused power they generated.

**Comment:** Further more if it is decided against reimbursement at minimum the excess money received by RMP by selling the excess power should be able to be used by the homeowner to offset the monthly fees charged by RMP. After all they got cash for it!

2. During the peak production period (middle of the day) RMP leads us to believe that if we conserve power and join their cool keeper program etc. they can delay the costly building of power plants.

**Comment:** Doesn't solar do that? The solar customer satisfies most if not all of their own needs and in some cases more than that. Doesn't this meet the RMP conservation goals?

3. There has been a proposal to add a \$4.50 additional charge on the bill of people who use solar. They (RMP) say the normal charges don't cover the cost of being connected to the grid.

**Comment:** If that is true then part of their profits are being used to pay for connection to the grid. In which case the monthly fee should be raised for everyone and the cost of the electricity should be reduced for everyone. The connection fee should cover the cost for anyone to be connected to the grid.

4. If peak demand is during the day when all the air conditioning units are on line then RMP should have no trouble meeting the demand of all customers at night. This would include the solar customers. If customers do not go to solar RMP currently has to meet that demand. So if a customer goes to solar there is no change to the after hours demand on the RMP grid.

5. The State of Utah and the Federal Government have clean air standards that are growing increasingly stringent.

**Comment:** Moving to a solar solution helps meet these clean air standards.

The above comments are pretty logical. To date the only statements I am aware of (from TV news) show some RMP guy with a vague statement about how solar does not fit with the RMP infrastructure. If that is the case

what is the difference between the HUGE Solar farm being built by RMP in UT and lots of little ones being built by homeowners? They have the same effect but at **ZERO cost to RMP**.

Can you point me to a document where RMP tries to make their case in technical detail? Because I have yet to hear an argument that makes any sense.

Thank you,

RJ



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

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**Fwd: Don't Let Utah Be the First State to Eliminate Net Metering #14-035-114**

1 message

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**David Clark** <drexclark@utah.gov>  
To: PublicService Commission <psc@utah.gov>

Thu, Oct 8, 2015 at 11:13 AM

----- Forwarded message -----

From: **Joshua Moore** <Moorejoshualee@gmail.com>  
Date: Wed, Oct 7, 2015 at 11:35 PM  
Subject: Don't Let Utah Be the First State to Eliminate Net Metering #14-035-114  
To: drexclark@utah.gov

Dear Commissioner Clark,

Please stand strong for net metering in Utah, a solar policy that is critical for driving growth, jobs and the ability to generate our own power on our rooftops. Net metering works because it does not create new taxes.

Solar gives Utahns like me the ability to have a choice in how our homes are powered. Rocky Mountain Power's proposal will kill the economics of solar, furthering our state's dependence on dirty fossil fuels. RMP's proposal will seriously damage our state's ability to grow a robust solar market. Please support policies that will encourage rooftop solar growth and energy independence in Utah.

Sincerely,

Joshua Moore



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

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**Fwd: Don't tax me for thinking of my children's future #14-035-114**

1 message

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**David Clark** <drexclark@utah.gov>  
To: PublicService Commission <psc@utah.gov>

Thu, Oct 8, 2015 at 11:13 AM

----- Forwarded message -----

From: **David Duehlmeier** <dduehlmeier@gmail.com>  
Date: Wed, Oct 7, 2015 at 11:33 PM  
Subject: Don't tax me for thinking of my children's future #14-035-114  
To: drexclark@utah.gov

Dear Commissioner Clark,

Please stand strong for net metering in Utah, a solar policy that is critical for driving growth, jobs and the ability to generate our own power on our rooftops. Net metering works because it does not create new taxes.

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Sincerely,

David Duehlmeier



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

**Fwd: Don't Let Utah Be the First State to Eliminate Net Metering #14-035-114**

1 message

David Clark <drexclark@utah.gov>  
To: PublicService Commission <psc@utah.gov>

Thu, Oct 8, 2015 at 11:13 AM

----- Forwarded message -----

From: **Gabrielle Roh** <Elbowfork@gmail.com>  
Date: Wed, Oct 7, 2015 at 10:51 PM  
Subject: Don't Let Utah Be the First State to Eliminate Net Metering #14-035-114  
To: drexclark@utah.gov

Dear Commissioner Clark,

Please stand strong for net metering in Utah, a solar policy that is critical for driving growth, jobs and the ability to generate our own power on our rooftops. Net metering works because it does not create new taxes.

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Sincerely,

Gabrielle Roh



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

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**Fwd: Don't Let Utah Be the First State to Eliminate Net Metering #14-035-114**

1 message

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Thad Levar <tleva@utah.gov>

Thu, Oct 8, 2015 at 12:59 PM

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

----- Forwarded message -----

From: **Joshua Moore** <Moorejoshualee@gmail.com>

Date: Wed, Oct 7, 2015 at 11:35 PM

Subject: Don't Let Utah Be the First State to Eliminate Net Metering #14-035-114

To: tleva@utah.gov

Dear Chairman LeVar,

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

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Thu, Oct 8, 2015 at 12:59 PM

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

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Sincerely,

Gabrielle Roh





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

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**Docket 14-035-114**

1 message

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**Nia Sherar** <nia@ofdc.org>

Thu, Oct 8, 2015 at 12:54 PM

To: psc@utah.gov

I will not be able to testify today so would like to have my voice heard here. I have a 3.1 rooftop system. Over the past 2.5 years, we have given 750kW to our neighbors and friends. I like the thought I am producing green power and sharing. If there had been a solar surcharge, I doubt we would have installed due to the initial upfront costs. Since installing we no longer use our A/C, just swamp cooler or fan. We turn everything off at the power strip to conserve as well. All this leads to less coal being burned and cleaner air. Cleaner air makes for healthier society, improved tourism and corporations coming to Utah for job creation. Please consider these as well as the hard numbers showing solar's value that are provided to you by UCARE, Utah Clean Energy and Sierra Club when making your decision.

Thank you,  
Nia

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Nia Z. Sherar  
Founder/Chair & General Administrator  
OFDC (Opportunity Fund for Developing Countries)  
1338 Emerson Ave  
Salt Lake City, UT 84105  
801-487-9380  
Celebrating over 16 *volunteer-powered* years - thank you!  
It is business as usual as we wind down over the next few years.  
Watch our 5 minute video: <http://www.ofdc.org>  
Read our blog: <http://ofdcorg.wordpress.com>  
LIKE us on facebook: <http://www.facebook.com/Pages/OFDC/105028766224448>



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

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**Fwd: Please support energy choice through solar #14-035-114**

1 message

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Thad Levar <tleva@utah.gov>

Thu, Oct 8, 2015 at 12:53 PM

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

----- Forwarded message -----

From: **Leslie Snow** <kbslls@comcast.net>

Date: Wed, Oct 7, 2015 at 5:01 PM

Subject: Please support energy choice through solar #14-035-114

To: tleva@utah.gov

Dear Chairman LeVar,

Rocky Mountain Power's proposal to levy discriminatory and unpredictable charges on solar customers is an out-of-state play that will destroy a future solar market in our state. We should not allow failed attempts of other states to hamper our state's transition to a cleaner and independent energy market.

Independent studies find that solar keeps energy rates low. Supporting policies that will encourage rooftop solar deployment will create more local jobs for Utahns. RMP's proposal is clearly an attempt for the utility to further entrench its deep monopolistic roots and eliminate a future competitive energy market.

Please stop the attack on rooftop solar and energy choice in Utah.

Sincerely,

Leslie Snow



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

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**Net metering NEM Docket 14035114**

1 message

**Dan Schroeder** <dvs1444@gmail.com>

Thu, Oct 8, 2015 at 9:17 AM

To: psc@utah.gov

Dear members of the Public Service Commission:

I write concerning solar energy, net metering policies, and residential electricity rates.

Less than a decade ago, the monthly "basic charge" on my electricity bill was 98 cents. Since then it has increased six times, most recently in September 2014. Now it is \$6, more than 500% higher than in 2006. As you know, there is also a \$2 "minimum charge" that effectively raises the basic charge to \$8.00 per month.

I don't know exactly what a fair charge is, to cover my share of the expense of maintaining the electrical grid. But I suspect that \$0.98 was too low, and that \$8.00 is more than sufficient.

Many customers, of course, use so much electricity that they hardly notice the basic charge. I am in the minority that very much notices. My average monthly use is barely over 100 kWh, and there have been months when I've used less than 50 kWh. At 9 cents/kWh, the corresponding usage-based charges come to only \$9.00 and \$4.50, respectively.

This August I installed a small PV system that will generate more electricity than I use over the course of a year. Thus, under current net-metering policies, I expect to pay only the \$8.00 minimum charge plus taxes. During a typical month I expect to be pulling about 70 kWh off the grid, and to be pushing somewhat more than that onto the grid for others to use.

If, hypothetically, I had to pay another \$4.65 per month for the privilege of generating this small amount of electricity, then I would effectively be getting a credit of only about 3 cents per kWh for the electricity that I push onto the grid--only about a third the price that my neighbors would pay for using that same electricity. At \$0.03/kWh, my PV system will never come close to paying for itself (even after tax credits).

I fully understand that my PV system generates electricity only when the sun is shining, and that demand continues around the clock. Even so, I believe the value of the electricity I supply to be far greater than \$0.03/kWh. Utah's electricity demand peaks on sunny summer afternoons. PV owners like myself are currently helping to accommodate that peak demand, and hence saving the power company from having to pay high wholesale prices at those times.

I further understand that PV will eventually grow to provide a much larger portion of Utah's electricity, and that at some point it will no longer be reducing the peak demand but merely shifting the peak later into the afternoon. At that point I would fully support time-of-day metering policies, for both electricity users and electricity producers, to accurately reflect the varying value of electricity at different times. If there are significant costs for accommodating large amounts of distributed generation on the grid, I could also support a slight lowering of the 1:1 net metering credit.

At present, however, PV is such a small share of electricity generation in Utah that there is no need to add any complexity to the net metering policy. In fact, the policy should be simplified by eliminating the \$2.00 minimum charge and charging all customers the same basic charge.

The worst thing you could possibly do would be to add a flat-rate surcharge on all PV producers, hitting small producers like me the hardest. Please don't do that.

Sincerely,

Daniel V. Schroeder

10/8/2015

Mail - Net metering NEM Docket 14035114

1444 Binford Street  
Ogden, UT 84401



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

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## Proposed Net Metering Fee

1 message

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**Gernot Laicher** <gernot.laicher@gmail.com>

Thu, Oct 8, 2015 at 9:34 AM

To: PSC@utah.gov

Dear Public Service Commission,

I would like to express my opposition to the proposed fee for net metering of solar installations for several reasons:

- 1) Solar power installations serve the public through avoidance of air pollution along the Wasatch front. Air pollution is the most significant drawback of living along the Wasatch front. It is a public health hazard and any action that works towards the reduction of air pollution should be rewarded through financial incentives. An additional net metering fee (on top of the base fee that all net metering customers already pay) tends to discourage solar installation.
- 2) Solar power actually helps reduce the price of electricity for customers that do not have solar power because it allows the power company to defer installation of new power plants further into the future and allows them to meet growing demand with existing facilities.
- 3) Most solar power is generated during peak hours of electricity consumption in the middle of the day and thus helps level peak generating needs. It is the peak generating requirements that determine the size of power plants.
- 4) Power companies already recognize the financial benefit of energy conservation because it allows them to defer upgrading facilities. Whether a customer uses less energy provided by the power company because the customer installs energy efficient appliances and lights, or whether the customer uses less energy due to a solar installation is not very different in terms of its effect on the power company. Why should one be rewarded with rebates and the other punished with an extra fee?
- 5) Most owners of small scale solar power installations are not in it for personal profit. They do it in part because they want to be part of the solution to the air pollution problem. I cannot say the same for the power company which has mostly the interests of its CEO and shareholders in mind.
- 6) Net metering fees will encourage the use of house batteries (such as those marketed by Solar City) to disconnect entirely from the public grid and not only avoid the net metering fee but also the base fee they already pay (about \$9 per month). Such move towards home batteries would reduce the benefit of solar installations to conventional customers by not helping to reduce peak generating needs at the power plant. It may thus actually raise the base fee and electricity rates for other customers if solar installations completely disconnect from the grid.

My impression of the efforts by power companies to raise the cost of owning a solar installation is simply a self-serving preemptive move to discourage the development of alternative energy sources which in the long term will limit the growth of revenues for the shareholders of utility companies that want to continue to use fossil fuels for power generation.

I would like to encourage you to consider the significant long term negative impact a net metering fee will have not only on the air quality along the Wasatch front, but also on the development of the growing job market in the solar installation industry and on the utility rates for the other customers who currently actually financially benefit from solar installations.

Respectfully,  
Gernot Laicher





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

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**RE: Rooftop Solar**

1 message

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**Angelika Davis** <apgconsulting@hotmail.com>

Thu, Oct 8, 2015 at 9:41 AM

To: "PSC@utah.gov" &lt;psc@utah.gov&gt;

Dear PSC Ladies and Gentlemen

We installed rooftop solar in 2015.

I feel that if the fees and charges from Rocky Mountain Power get excessive the reaction of the solar community will be to buy batteries to store their power generated during the day to use it at night and to remove this cheap source of electricity from Rocky Mountain Powers supply line. This will make Rocky Mountain Power go on the open market to purchase electricity at peak costs during the day. Especially in the summer months. I am referring to the solar power as "cheap" because Rocky Mountain Power has no capital investment in the equipment that generated this power.

Best regards

Angelika Davis



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

**comments: Docket # 14-035-114**

1 message

**PEGGY and DEBORAH** <debpeg@q.com>

Thu, Oct 8, 2015 at 10:12 AM

To: psc@utah.gov

RE: Docket # 14-035-114

Dear PSC Staff,

My name is Deborah Davidson. I live in Centerville, Utah. Thank you for considering my comments on Rocky Mountain Power's Net Metering Policy.

Every Utah citizen and business benefits from cleaner air. It is my understanding that the majority of RMP power in Utah comes from coal burning power plants. Investment in solar arrays for our homes, churches and businesses should be encouraged, not penalized. I realize that Rocky Mountain Power may incur costs to manage net metering. Those costs should be carefully scrutinized and any fee increases kept to a minimum and shared among RMP and all its customers.

Thank you,

Deborah Davidson  
PO Box 167  
Centerville UT 84014





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

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**Docket 14-035-114**

1 message

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**John Ostlund** <johnno@usc6.com>  
To: "psc@utah.gov" <psc@utah.gov>

Thu, Oct 8, 2015 at 10:37 AM

To whom it may concern.

I, as a owner of a solar panel system on my roof would like to voice my opinion on Rocky Mountain Power wanting to charge me a fee on my net meter. As some one who has a concern over the environment and my impact on our air quality, going solar was a no brainer. "Our" air quality in Utah, especially Salt lake, Davis and Utah counties is top on my list of gov't concerns. What each of us can do to help is all of our responsibility. Penalizing the customers who want to help should not be allowed on any front. The fact that RMP will put a monitor on my air conditioner to limit my use when they see fit and giving me money to let them do it, then to turn around and charge me for " producing" electricity to intern feed **their** system when consumption is high makes **NO** sense at all. You would think they would appreciate the little help.

Please stop this crazy notion. They all ready have a monopoly, please don't let them push us little consumers around.

John R. Ostlund  
United Structural Concrete  
96 South 1200 West - Lindon, Utah 84042  
801-221-9951



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

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**Docket 14-035-114**

1 message

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**Dennis Anderson** <denniseanderson@gmail.com>

Thu, Oct 8, 2015 at 10:41 AM

To: psc@utah.gov

It's my understanding that solar users want to generate power during the day, feed the surplus to RMP and receive credit so the power they use from RMP at night cost them little or nothing. Based on my understanding, I believe they should be expected to pay RMP for the convenience of being able to use their power at night; perhaps at a reduced rate. It costs RMP to maintain their generation capabilities for everyone, including the solar users.

Dennis Anderson

Cell: 801-694-3820

denniseanderson@gmail.com



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

**Fwd: Don't Let Utah Be the First State to Eliminate Net Metering #14-035-114**

1 message

Jordan White <jordanwhite@utah.gov>  
To: PublicService Commission <psc@utah.gov>

Thu, Oct 8, 2015 at 6:35 AM

----- Forwarded message -----

From: **Joshua Moore** <Moorejoshualee@gmail.com>  
Date: Wednesday, October 7, 2015  
Subject: Don't Let Utah Be the First State to Eliminate Net Metering #14-035-114  
To: jordanwhite@utah.gov

Dear Commissioner White,

Please stand strong for net metering in Utah, a solar policy that is critical for driving growth, jobs and the ability to generate our own power on our rooftops. Net metering works because it does not create new taxes.

Solar gives Utahns like me the ability to have a choice in how our homes are powered. Rocky Mountain Power's proposal will kill the economics of solar, furthering our state's dependence on dirty fossil fuels. RMP's proposal will seriously damage our state's ability to grow a robust solar market. Please support policies that will encourage rooftop solar growth and energy independence in Utah.

Sincerely,

Joshua Moore



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

**Fwd: Don't tax me for thinking of my children's future #14-035-114**

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Sincerely,

Gabrielle Roh



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

**Docket No. 14-035-114**

1 message

**Robert Bigelow** <ngc84101@yahoo.com>  
Reply-To: Robert Bigelow <ngc84101@yahoo.com>  
To: "psc@utah.gov" <psc@utah.gov>

Thu, Oct 8, 2015 at 12:10 AM

In the Investigation of the Costs and Benefits of PacifiCorp's Net Metering Program, please take into account that solar power generation by individuals reduces the need for PacifiCorp to invest in increased power generation capacity. In that regard, it is more effective than efforts to encourage conservation. Also, please take into account the value of excess power that is forfeited by solar power system owners to PacifiCorp at the end of March each year.  
Thank you.  
Robert Bigelow



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

## Comments regarding RMP net-metering proposal, #14-035-114

1 message

Giles <saninji@yahoo.com>  
Reply-To: Giles <saninji@yahoo.com>  
To: "psc@utah.gov" <psc@utah.gov>

Thu, Oct 8, 2015 at 12:02 AM

Dear Commissioners,

Thank you for taking the time to investigate the costs and benefits of roof top solar. I believe in the power of numbers, because they can largely speak for themselves.

For instance, I have a small 2KW photovoltaic solar array on my home. For utility-scale PV projects, capital costs alone amount to approximately \$2.00 per installed watt of capacity, meaning that my system would cost ratepayers over \$4000 if Rocky Mountain Power (RMP) were to build a solar PV facility. Rate payers did not have to pay this cost, however.

Since installing it a few years ago, my array has produced 9.5 MWH of electricity. Of that amount:

2.5 MWH was used directly by my household, allowing me to reduce my reliance on coal by 40%.  
7 MWH was added to the grid, and consumed by my neighbors, reducing their coal reliance as well. This electricity was billed to my neighbors at the full retail rate, and the same amount was credited to my bill. Of that 7 MWH credit, I used only 3.5 MWH from the grid. The remaining unused 3.5 MWH of electricity (a retail value of approximately \$350) was sold to my neighbors by RMP without incurring any fuel or transmission costs.

Over the +30 year lifetime of my PV array, it can be estimated that my system will produce 40 MWH of surplus energy, with an RMP avoided cost retail value of \$4000, at current rate levels. When combined with RMP's avoided capital costs of installing and maintaining my PV array, the total avoided costs amount to over \$10000.

Now, on the other hand, RMP claims to incur a cost of \$4.55 per month from solar energy producers. Assuming this to be the case, we can determine that RMP's total costs amounts to \$1638 ( $\$4.55 \times 12 \text{ months} \times 30 \text{ years}$ ).

\$10000 avoided costs - \$1638 in claimed costs = a pretty darn good deal to ratepayers. As you can see, it's difficult for someone in my situation to understand any of RMP's claims to the contrary. It's also difficult for me to understand how I could go from being a thrifty electricity customer with \$20 monthly electricity bills - and be of little concern to RMP - to a surplus producer of clean renewable energy with \$10 base-rate electricity bills, and targeted with what amounts to a 50% rate increase due to the proposed net metering fee.

Rather than singling out a portion of RMP's customer base to cover avoided costs that don't exist, it would be far more productive to shift the focus to the antiquated electric rate structure itself, as it is clearly at odds with society's existential interest in transitioning to a clean, renewable energy future. By shifting the way that RMP recoups its costs from a per-kilowatt basis (where more consumption equals more profit) to a per-customer basis (where less consumption equals more savings, thus more profit), both RMP and distributed solar energy producers could be incentivized to work together to create a 21<sup>st</sup> century electric grid.

We can protect a utility's bottom line, and society's, but RMP's assault on solar energy producers would do neither. Instead, it would constitute a capricious form of denial of the global challenges we face in 2015, and beyond. It's time to think outside of the grid.

--

Giles Larsen  
Consultant, **Solar Sapiens**

1030 W California  
SLC, UT 84104

10/8/2015

Mail - Comments regarding RMP net-metering proposal, #14-035-114

801-596-0326

Want to *Go Solar*? I can help!



PV Installation  
Professional





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

**Don't Let Utah Be the First State to Eliminate Net Metering #14-035-114**

1 message

**Joshua Moore** <Moorejoshualee@gmail.com>

Wed, Oct 7, 2015 at 11:35 PM

To: tlevar@utah.gov

Dear Chairman LeVar,

Please stand strong for net metering in Utah, a solar policy that is critical for driving growth, jobs and the ability to generate our own power on our rooftops. Net metering works because it does not create new taxes.

Solar gives Utahns like me the ability to have a choice in how our homes are powered. Rocky Mountain Power's proposal will kill the economics of solar, furthering our state's dependence on dirty fossil fuels. RMP's proposal will seriously damage our state's ability to grow a robust solar market. Please support policies that will encourage rooftop solar growth and energy independence in Utah.

Sincerely,

Joshua Moore



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

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

**Don't tax me for thinking of my children's future #14-035-114**

1 message

David Duehlmeier &lt;dduehlmeier@gmail.com&gt;

Wed, Oct 7, 2015 at 11:33 PM

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

**Don't Let Utah Be the First State to Eliminate Net Metering #14-035-114**

1 message

**Gabrielle Roh** <Elbowfork@gmail.com>

Wed, Oct 7, 2015 at 10:51 PM

To: tlevar@utah.gov

Dear Chairman LeVar,

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Sincerely,

Gabrielle Roh



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

## Rooftop Solar

1 message

**Angelika Davis** <apgconsulting@hotmail.com>

Wed, Oct 7, 2015 at 9:43 PM

To: "PSC@utah.gov" &lt;psc@utah.gov&gt;

Dear PSC Ladies and Gentlemen,

We installed rooftop solar on our house this spring.

The reason we finally committed to spending upward of \$13,000 was to make a positive investment in Utah's energy future.

The winter inversion and pollution months have taken its toll on my and my neighbors health.

Clean energy is the future!!! Burning coal for dirty energy is the past!!!

We must move forward!!!

Federal and Utah State tax incentives for solar installation are proof of that.

We invested our private funds into capital investments that should really be funded by Rocky Mountain Power. And now Rocky Mountain Power wants to squeeze more money out of those individuals who have already made a significant financial commitment.

How wrong is that!!!

As a State we must support solar energy not punish it.

Is it a contradiction that Rocky Mountain Power encourages home insulation, low energy appliances and LEED light bulbs and on the other hand wants to punish the solar community for their contribution of electricity? I am baffled!

Thank you

Angelika Davis



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

**Fwd: Please support energy choice through solar #14-035-114**

1 message

**David Clark** <drexclark@utah.gov>

Wed, Oct 7, 2015 at 5:11 PM

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

----- Forwarded message -----

From: **Leslie Snow** <kbslls@comcast.net>

Date: Wed, Oct 7, 2015 at 5:01 PM

Subject: Please support energy choice through solar #14-035-114

To: drexclark@utah.gov

Dear Commissioner Clark,

Rocky Mountain Power's proposal to levy discriminatory and unpredictable charges on solar customers is an out-of-state play that will destroy a future solar market in our state. We should not allow failed attempts of other states to hamper our state's transition to a cleaner and independent energy market.

Independent studies find that solar keeps energy rates low. Supporting policies that will encourage rooftop solar deployment will create more local jobs for Utahns. RMP's proposal is clearly an attempt for the utility to further entrench its deep monopolistic roots and eliminate a future competitive energy market.

Please stop the attack on rooftop solar and energy choice in Utah.

Sincerely,

Leslie Snow





PublicService Commission <psc@utah.gov>

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## Fwd: Please support energy choice through solar #14-035-114

1 message

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**Jordan White** <jordanwhite@utah.gov>  
To: PublicService Commission <psc@utah.gov>

Wed, Oct 7, 2015 at 5:02 PM

----- Forwarded message -----

From: **Leslie Snow** <kbslls@comcast.net>  
Date: Wednesday, October 7, 2015  
Subject: Please support energy choice through solar #14-035-114  
To: jordanwhite@utah.gov

Dear Commissioner White,

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Sincerely,

Leslie Snow



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

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1 message

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To: tlevar@utah.gov

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Sincerely,

Leslie Snow



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

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**Docket 14-035-114 Re: Rooftop Solar Projects**

1 message

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**beth.allen1@comcast.net** <beth.allen1@comcast.net>  
To: psc@utah.gov

Thu, Oct 8, 2015 at 2:27 PM

Good afternoon,

Unfortunately, I will be unable to attend the hearing about solar roof top projects today. I have been to meetings in the past, but have a prior commitment today.

I am very troubled by the fact that we are once again visiting the topic of rooftop solar panels and the possibility of increased monthly fees being added to the bills of those who are trying to do the right thing for the environment. It is a courageous step for those folks who pay thousands of dollars to have solar panels installed and to penalize them for doing so is ludicrous in my opinion.

There are so many costs involved in transmitting electricity over the miles and power companies have been subsidized for years. It is time for all of us to look toward a future built on renewable, sustainable energy rather than relying on fossil fuels that are causing untold damage to our environment and our health. We need to decrease barriers to companies and individuals who are trying to phase out fossil fuels and develop solar and wind technology.

Please work together with the solar and wind power companies to build a clean energy future for all of us. Cooperation, not corporate greed, is where the future lies.

Please register my vote against any discriminatory rate hikes for those citizens who have installed roof top solar panels.

Thank-you.

Beth Allen  
Salt Lake City



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

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**Docket 14-035-114**

1 message

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**Ryan Perry** <ryan@auricsolar.com>  
To: psc@utah.gov

Thu, Oct 8, 2015 at 4:09 PM

RE: Docket 14-035-114 - Energy Storage and Demand Side Management

Dear Public Service Committee,

I am writing to voice my support for solar, as currently being addressed by Docket 14-035-114. As an employee of Auric Solar, I represent one of the many Utah citizens employed in the rapidly growing solar market.

This morning we officially turned on Utah's largest privately owned solar array for the REAL salt lake stadium. While at the event, I had the privilege of meeting the CEO of Rocky Mountain Power, Cindy Crane, who came out to support renewable energy. She mentioned she worked for RMP, but not knowing who she was, I started casually telling her how pleased I was with the positive and supportive demeanor of their customer service team when I work with clients to call in and get usage history to assist in properly sizing their home solar arrays. Rather comically, it was only at this moment that Cindy disclosed her role and we both had a very positive chuckle about the coincidence. The comments at this landmark event were surprisingly inspiring as RMP, RSL, Sandy City, and Auric Solar came together in support of solar. RMP, through their USIP program, donated substantially to the project, and told of their commitment to solar through the Blue Sky and Community Solar programs they also sponsor, which helps citizens unreachable to Auric, such as renters or those without suitable roof space, to support solar through other ways.

Thank you for your cautious concern and attention to the long term impacts your decision on the rate analysis scope will have. In Utah, we have the solar potential to power not only all of our facilities' electrical needs, but all of our energy needs period, including transportation. Such a long term transformation would do much to alleviate the pollution concerns in Utah, which has some of the worst air quality in the nation. And, we could do it primarily using rooftops and solar covered parking stalls in vacant parking lots. Of course not all of the technology is yet developed to make this a reality immediately. We need better energy storage technology. Over the coming decades, as energy storage technology improves, we could make huge strides, but if we are not careful with our policy, we may stop, or severely hinder it.

Rocky Mountain Power claims Net Metering adds little benefit to the grid, largely due to imperfect correlation between NM production and grid energy demand. Specifically, they point out that demand peaks later in the evening than does NM production. While there may be some truth to this claim, in that net metering peak production does not perfectly align with peak demand, the correlation doesn't have to be perfect to still provide an advantage. We need to adequately address in the analysis the long term advantage that emerging distributed energy storage technology, a form of Demand Side Management (DSM), could have towards improving the alignment. Solar and energy storage cannot be separated. A decision discouraging the first will ultimately hinder the latter, and we will incur the associated opportunity costs.

Costs of delaying these improvements include those associated with demand smoothing (i.e. peaker plants), other demand management programs, higher costs of energy itself. There are also environmental, and health impacts associated with pollution, which are not currently adequately covered by RMP's legal obligations to the community. Non-renewable energy sources are subject to exponential cost increases seen when demand for a diminishing resource results in a zero-sum game. Alternatively, renewable energy sources are abundant and cheap. While currently not deemed reliable enough to play a significant role in our energy needs, distributed energy storage bridges the gap to make them a far more cost effective long term solution. Even without distributed energy storage, additional solar does reduce peak demand resulting in higher system reliability on peak demand days, reducing the probability of a power outage. Potential costs of power interruption to consumers and business include lost information, lost business, spoiled goods (produce, pharmaceuticals), and in extreme cases, loss of life.

The proposed fee discourages adoption of not only solar, but distributed energy storage, which in conjunction with conservation, is a critical demand side management (DSM) strategy that has significant value in improving grid reliability and keeping long-term energy costs down. Supporting solar and emerging energy storage technologies makes powering not only our facilities, but our transportation, with clean energy easier, helping to make a long term transition leading to lower pollution levels and Blue Skies, as clearly advocated by both BlueSky (RMP's program of the same name sake), and the population at large. We are all in this together. Please ensure that the analysis addresses not only the present, but more importantly, the long term opportunity costs.

Ryan C. Perry     
Energy Consultant, M.B.A.  
[www.auricsolar.com](http://www.auricsolar.com)  
801-870-5744



Auric  
S O L A R



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

**Docket #14-035-114 public comment**

1 message

Jen Colby &lt;jenncolby@xmission.com&gt;

Thu, Oct 8, 2015 at 4:16 PM

To: psc@utah.gov

Dear PSC Commissioners,

My husband and I are Salt Lake City residents, Rocky Mountain Power customers, and Rocky Mountain Power (via Berkshire Hathaway Holdings) shareholders according to holdings listed in our various retirement portfolios. We also participate in the Blue Sky program. We currently do not have installed solar PV at our home. In the future, we may be interested in adding PV, however efficiency investments are our current focus, and shade trees preclude good solar siting on our roof.

Regardless of our own investment, we strongly support other residential customer investments in solar PV. In order to scale up distributed solar, we would be happy to see a small rate increase in our own bills needed.

We were opposed to Rocky Mountain Power's proposed rooftop solar fee of \$4.65 per month in 2014. We were glad to hear that the PSC questioned RMP on its justification and the company was at that time unable to show the math on the validity of their request. As we understand it, the current docket and legislative intent is to fairly and thoroughly review and document the net cost/benefit of rooftop, net-metered solar. We also understand that a coalition of local advocacy expert groups have submitted comments and we endorse those by reference. We are both well-educated residents and yet we realize that the technical nature of this case makes it difficult for non-engineers and non-economists to fully grasp the issues at hand. That is why we must rely on outside experts as well as your staff to do the modeling and deep dive into costs, benefits, and rate-setting. That said, we believe that more general public comments are still of great value in your analysis and we ask you to incorporate public sentiment as valid data, as well.

In every commentary I have read or heard by RMP representatives, they conveniently fail to mention the direct capital infrastructure investments that are being made by solar system owners and customers. The PSC must fully integrate the value of this capital investment into the cost-benefit analysis.

Rather than resisting the burgeoning interest in residence-level installations, RMP should embrace the new world of distributed – and smart – grids. Perhaps they should partner with installers to directly pay for and own the systems, like other companies are doing. In fact, this would be a terrific business model, using usage data in their system to strategically target homes and businesses on which to install equipment, perhaps networked in grids that could disconnect in power outages and assure continued power as backup to the grid. This could provide key reliability as weather becomes more extreme in a new climate regime.

For those customers who have periods of excess generation, as reported most recently at <http://www.psc.utah.gov/utilities/electric/elecindx/2015/documents/2694861503564o.pdf>, their kW are being valued at \$0.0346, if I read the report correctly. Given the physics of electrical distribution, those kW are likely just going to nearby neighbors, who are paying RMP full rates for that power. This may currently be a small overall dollar value, but should be calculated as a benefit to RMP. Further, excess KW are likely flowing to neighbors with almost no line loss, unlike significant line losses experienced with centralized, distant plants such as Huntington.

As you determine the modeling framework and consider adapting your current analysis models, I strongly urge your staff to begin integrating external costs into the models and overall rates. Economic analysis of externalities tied to environmental and social costs of various fuel sources are becoming more robust and these are real costs that are not fairly being paid by existing customers nor shareholders.

For example, a 2011 study attempted to quantify the full life cycle costs of coal.

"In a groundbreaking article to be released this month in the Annals of the New York Academy of Sciences, Dr.

Paul Epstein, associate director of the Center for Health and the Global Environment at Harvard Medical School, details the economic, health and environmental costs associated with each stage in the life cycle of coal – extraction, transportation, processing, and combustion. These costs, between a third to over half a trillion dollars annually, are directly passed on to the public. ....

The electricity derived from coal is an integral part of our daily lives. However, coal carries a heavy burden. The yearly and cumulative costs stemming from the aerosolized, solid, and water pollutants associated with the mining, processing, transport, and combustion of coal affect individuals, families, communities, ecological integrity, and the global climate. The economic implications go far beyond the prices we pay for electricity.

Our comprehensive review finds that the best estimate for the total economically quantifiable costs, based on a conservative weighting of many of the study findings, amount to some \$345.3 billion, adding close to 17.8¢/kWh of electricity generated from coal. The low estimate is \$175 billion, or over 9¢/kWh, while the true monetizable costs could be as much as the upper bounds of \$523.3 billion, adding close to 26.89¢/kWh. These and the more difficult to quantify externalities are borne by the general public.

The average residential price of electricity is 12¢/kWh.

The study notes that even these numbers are certainly underestimates of the full cost of coal:

Still these figures do not represent the full societal and environmental burden of coal. In quantifying the damages, we have omitted the impacts of toxic chemicals and heavy metals on ecological systems and diverse plants and animals; some ill-health endpoints (morbidity) aside from mortality related to air pollutants released through coal combustion that are still not captured; the direct risks and hazards posed by sludge, slurry, and CCW impoundments; the full contributions of nitrogen deposition to eutrophication of fresh and coastal sea water; the prolonged impacts of acid rain and acid mine drainage; many of the long-term impacts on the physical and mental health of those living in coal-field regions and nearby MTR sites; some of the health impacts and climate forcing due to increased tropospheric ozone formation; and the full assessment of impacts due to an increasingly unstable climate.

The true ecological and health costs of coal are thus far greater than the numbers suggest. Accounting for the many external costs over the life cycle for coal-derived electricity conservatively doubles to triples the price of coal per kWh of electricity generated." <http://thinkprogress.org/romm/2011/02/16/207534/life-cycle-study-coal-harvard-epstein-health/>

Externalities distort markets, lead to market failures (climate change being the most dramatic example), and disincentivize investments in efficiency and technology.

Because Rocky Mountain Power's energy mix predominantly relies on burning coal, it is a significant source of air pollution, both criteria pollutants and carbon dioxide. In fact, among all Western utilities, we understand that Rocky Mountain Power is the single largest source of air pollution. Costs such as haze at the national parks and impaired enjoyment and potential loss of tourism should be integrated into your models.

Please also conduct your modeling over a significant time period, say 10-15 years. According to the report at <http://www.psc.utah.gov/utilities/electric/elecindx/2015/documents/2694861503564o.pdf>, "The Division observes PacifiCorp's current enrolled net metering capacity of 32,994 kilowatts is 3.57 percent of the program cap of 923,000 kilowatts and states PacifiCorp reports no unforeseen problems or barriers in its tariff at this time." Model runs should integrate reasonably likely rates of PV solar installation over an extended time period and target the amount of PV and efficiency measures that collectively could extend the timeframe before new natural gas or other central generation is needed. As I understand it, until distributed PV begins to approach 20% of total, stability of the grid is not a significant issue. With less than 1% of capacity to date, we have a long way to go.

More rooftop solar should mean fewer investments in power plants and other expensive infrastructure, creating savings for all RMP customers. Perhaps rather than seeking a monthly connection fee, RMP should require households with PV and central air to enroll in Cool Keeper to help balance loads when needed.

We expect that a fair analysis would show that rooftop solar is actually benefiting RMP's bottom line. In addition to the direct power generation, most customers with solar systems become extremely conscientious energy users, recognizing that the kilowatt not used is the kilowatt-capacity they don't need to install. RMP publically touts its program to buy "negawatts" in the form of conservation programs. Customers with solar



systems most likely save significant overall kW. The PSC should ask RMP to document the trends and savings, which are likely worth more than the originally proposed \$4.65 per month fee. They also benefit the local economy, and this must be integrated into the analysis. Recently, large solar companies have brought jobs and business to Utah, and this value must be integrated into models.

From a political standpoint, let's also recognize the larger picture - these rate cases and state-level anti-solar bills are being run simultaneously in states across the country based often on boilerplate language provided by the American Legislative Council and corporate representatives at the behest of legacy fossil fuel producers, largely the coal industry. The PSC should not fall for this anti-competitive attack on the clean energy industry that will carry us into the future.

One other point about externalities: Utahns pay artificially low electrical rates due to the fact the RMP does not pay impact fees or direct costs of the environmental and health damage caused by its majority-fossil-fuel based generation of electricity. This public subsidy makes it very difficult for renewable sources to compete fairly, and spreads the costs across a broad base of people who aren't necessarily responsible for the pollutants. Low income and minority residents and customers tend to be disproportionately affected by air pollutants as their communities are often nearest the plants and associated power systems. The consumer advocate must look out for environmental justice and real costs, not just focus on keeping power artificially "cheap." Low income people need better housing, weatherization, better wages and social safety net programs - artificially cheap power is not the correct way to help them, and actually disproportionately benefits the wealthy. With full environmental and health cost accounting, investment in conservation and renewable energy will pencil out properly. Legacy fossil fuels, whose consumption must be reduced drastically to prevent further catastrophic global warming consequences. We hope that a fair analysis may show that rather than a monthly fee, net metered customers may in fact be due a higher rate or other compensation for the value of clean, distributed energy.

Finally, as shareholders in the parent company of RMP via retirement portfolios, we are concerned about future loss of value in said companies due to over-reliance on fossil fuel generation. These companies may end up with significant stranded assets in the form of legacy fossil fuel plants caused by long-overdue environmental regulations, loss of finite, affordable fuel sources, and failure to creatively and proactively adapt to a new energy, grid, and climate regime. Berkshire Hathaway has recently made a climate pledge but the company has yet to embrace distributed generation, favoring control over central generation instead. This is the old model of doing business. It needs to adapt to new technological, fuel source, and climate realities.

I ask that the PSC work diligently to guide our utilities along this path to meet regulatory requirements as well as the needs of current and future generations for a clean, healthy future for all. Utah has prime solar potential. Please help move us all to a brighter and more stable future. Assure that the cost-benefit model is robust, long-term, and begins to integrate externalities.

Sincerely,

Jen Colby

160 S Lincoln St

Salt Lake City, UT



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

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## Net Metering Hearing

1 message

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Paul Domgaard <c8551@aol.com>

Thu, Oct 8, 2015 at 4:03 PM

To: psc@utah.gov

To whom it may concern:

Several years ago I put enough solar panels (panels) on the roof of my house to bring our power bills to the minimum charge.

When we started the minimum monthly charge was \$5.00 now its \$9.00.

I the the past before we installed the panels we would experience brown out and power outages on a regular basis during the summer months.

Since installing the panels using Net Metering our quality of power during the summer months has been much better with fewer power outages and no brown outs.

We took the initiative to purchase the panels on our house to improve the power quality in the house ( We have had neighbors suffer major air conditioning systems repairs bills due impart to summer time power outages). The State and Federal Tax Incentive also helped in the short run.

When I put our original proforma together to test the idea if it would pay to install panels on the house.

I figured of the 25 year warrant of the panels it would take 17 years of power saved at current prices to cover the cost of the panels.

Without the government tax credit this is money I would have to pay out anyway even without the panels.

Eight years of free board would make a wise investment for the family and help the neighbors when I am able given the risks that must be navigated through.

In the last couple years the minimum monthly charge has risen to \$9.00 a 180% increase.

People are spending more of time complaining about how my panels taking are advantage of the "system".

This is a burden given the fact that its easy to complain about what the neighbor has done in taking the risk I have in spending my household energy dollars upfront hoping to realize a small monetary savings over the long term life of my house.

In March each year our Net Metering Agreement Zeros out.

In 2014 we had a balance of 900+ KWH swept from our account.

I understand it is part of the existing contract.

I called and ask a Representative of Rocky Mountain Power where to KWH went.

He explained that it has no monetary value and was there fore good for nothing.

I would suggest that these KWH be given the same value as if I had purchased KWH from Rocky Mountain Power to off set the minimum charge.

The power was put into the grid and not stored in my control.

It was not through down the "RAT HOLE."

Rocky Mountain Power is gaining revenue from the KWH my panels generate without incurring the expense of generating the KWH at their facilities.

I believe the KWN that comes from the panels on my house does get out the transformer box that services 3 houses on my neighbors homes without being used even on the best production days.

The impact on the electrical grid is minimal.

I would like this massage will be entered in as part the comments that are made tonight at the Public Service Commission Meeting.

I would have liked to attend in person.

Sincerely  
Paul R. Domgaard  
Riverton, Utah