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Sunrise  
Renewable Energy Partners, LLC

Black Diamond

October 5, 2015

ATTN: The Public Service Commission of Utah  
RE: Net Metering Cost Benefit Analysis – Docket 14-035-114

Dear Commissioners:

Thank you for your service and the opportunity to provide input on the cost benefit analytical framework for rooftop solar. We, the undersigned local and national businesses, organizations and municipal governments represent a diverse group of Utah interests and are concerned about the future of solar energy development in Utah and any impacts that may stifle its market potential. In order to fairly assess the value of such an important energy resource as distributed rooftop solar, we respectfully recommend that the Commission's analytical framework capture the long-term benefits that rooftop solar provides to the utility system and all ratepayers, and that it not underestimate the immense economic and societal benefits that solar energy brings to Utah's economy, residents, and business community.

As business leaders, we know the importance of long-term planning, the value of economic efficiency, and the benefits of leveraging investments. We ask that the Commission incorporate the benefits that can be leveraged from private investments in rooftop solar into the analytical framework in the same way that benefits leveraged from utility energy efficiency programs are analyzed. Because rooftop solar is on the customer-side of the meter, its costs and benefits to the utility system should be evaluated in the same manner as other customer-side investments, such as energy efficiency programs like Rocky Mountain Power's WattSmart program. Similar to energy efficiency resources, distributed solar resources can help avoid the need for other costly utility investments and expenditures, thereby keeping costs down.

Finally, to the issue of lost sales. As a community of business leaders, we understand that the utility is concerned by lost sales from rooftop solar. However, this is a different issue from valuing solar. We are not asking that the Commission disregard the utility's lost sales in the cost benefit analysis, or the costs the utility incurs to deliver electricity to all ratepayers; rather, we support a complementary analysis that evaluates the rate impacts of reduced utility sales.

In conclusion, it is in the best interests of all Utahns for the Commission to examine the long term benefits that a distributed solar resource provides while also looking at the rate impacts of reduced utility revenues. In this way, the Commission will be able to see the entire picture and make smart, informed decisions that are both economically efficient and fair to ratepayers. To do otherwise threatens Utah's goals of affordable, stable-priced and sustainable energy, as well as Utah's environment and economic vitality. In summary, we request a two part analytical framework that evaluates the costs and benefits over the long term using standard procedures for energy efficiency programs, and a complementary, long term rate impact analysis.

Again, thank you for your service and for your consideration of our comments.

Sincerely,

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