



has established community-level renewable energy and pollution reduction goals that may be impacted by the outcomes of this docket. More specifically, the County is a participant in the Mountain Town Community Solar Program, which was approved and funded beginning in April 2016. The County is also a participant in the Community Renewable Energy study.

2. The County is responsible for protecting the public health and safety of its residents, which includes facilitating access to clean air, dependable and affordable energy, clean water and a livable environment. The County has determined that meaningful reductions in pollution and greenhouse gas emissions will benefit all County residents, visitors, and businesses through improved public health, additional economic opportunities, long-term energy price stability and a stronger sense of community sustainability.
3. The County is a net metering customer of Rocky Mountain Power who consumes a large amount of electricity across many sites. The County has an interest in developing new renewable energy systems through net metering arrangements. The cost-benefit methods and values set through this docket have the potential to impact the County's existing renewable energy systems and ability to develop new projects.
4. Rocky Mountain Power has filed its Compliance Filing and Request to Complete All Analyses Required Under the Net Metering Statute for the Evaluation of the Net Metering Program, dated November 9, 2016 (the "Compliance Filing").
5. In accordance with UCA §54-15-105.1, the Commission is tasked with determining the costs and benefits of Rocky Mountain Power's Net Metering Program and

determining a “just and reasonable charge, credit, or ratemaking structure . . . in light of the costs and benefits.”

6. Rocky Mountain Power asserts in its Compliance Filing that the costs of the Net Metering Program on the company and its other customers exceeds the benefits to net metering customers; thereby creating an unjust and unreasonable rate structure that unfairly shifts costs to other customers. Rocky Mountain Power proposes a series of new fee schedules (Schedule 136, Net Metering Service; Schedule 5, Residential Customer Generators), which create a special rate structure for net metering customers. The net effect of this proposal is a resultant increase in the costs to net metering customers.
7. Rocky Mountain Power’s cost-benefit analysis that it has presented to the Commission fails to recognize the value that distributed generation provides within neighborhoods and communities. Specifically, the excess generation of one net-metered customer provides clean renewable power at no cost to neighboring households. This distribution reduces transmission line losses, reduces the amount of electricity generation required from Rocky Mountain Power and reduces emissions known to negatively impact human health. Providing renewable energy is a public good that should be encouraged rather than cost burdened by those individuals or entities who have voluntarily incurred the cost burden of roof top solar.
8. The proposed Schedule 136 and Schedule 5 provide for a 3-tier rate design for new solar customers effective Dec 10, 2016 that will reduce the kWh credit back to customers from 10.5 cents/kWh to 7.1 cents/kWh and increase the cost of service to

net metering customers by effectively creating a new commercial rate. Instead of the average 900kW/month household saving \$133/month with solar, they'll only see \$74/month cost savings (based on installation that provides 50% of their usage).

Given the upfront capital costs incurred by net metering customers to install a rooftop solar generator system, the reduction in savings by nearly \$60/month effectively ends the Net Metering Program in Utah. Such is a substantial detriment to the County and its sustainability programs and goals.

9. Given the dramatic rate changes proposed by Rocky Mountain Power, the County objects to the fast track docketing process proposed by Rocky Mountain Power. Something of this magnitude requires that Rocky Mountain Power go through the normal rate-setting process, which allows more time for interested parties to evaluate Rocky Mountain Power's Compliance Filing and submit expert testimony. The issues brought forward by Rocky Mountain Power should be thoughtfully considered in the next general rate case, not in the accelerated time frame proposed. The County has an interest in ensuring a full and fair hearing of this proposal.
10. The County has a significant interest in the above-captioned matter for the reasons set forth herein. As such, the County's legal rights and interests may be substantially affected by the outcome of this docket.
11. The County's intervention and participation in this matter will not materially impair the prompt and orderly conduct of these proceedings.
- 12.

The County requests that all notices and filings in this docket be served on:

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P.O. Box 128  
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**NOW THEREFORE**, the County respectfully requests leave to intervene in this proceeding and asks that the Commission enter an Order granting the County's petition to intervene enabling the County to participate to the full extent allowed by law.

DATED this 17<sup>th</sup> day of November 2016.

SUMMIT COUNTY ATTORNEY'S OFFICE

By: /s/ *David L Thomas*  
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*Attorneys for Summit County*

## CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing Petition to Intervene of Summit County, to be emailed, to the following this 17<sup>th</sup> day of November 2016:

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