

Michael Shea
Policy Associate HEAL Utah
Matt Pacenza
Executive Director HEAL Utah
824 South 400 West
Suite B111
Salt Lake City, UT 84101
Telephone: 801-355-5055
michael@healutah.org
matt@healutah.org

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

<p>In the Matter of the Investigation of the Costs and Benefits of PacifiCorp's Net Metering Program</p>	<p>Docket No. 14-035-114</p> <p>PETITION TO INTERVENE OF HEAL UTAH</p>
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HEAL Utah hereby petitions the Public Service Commission of Utah for leave to intervene in the above-entitled pursuant to Utah Code Ann. §63G-4-207 and Utah Admin. R746-100-7.

The grounds for this petition are as follows:

1. HEAL Utah is a 501(c)(3) organization whose purpose is to advocate and pursue policies which will encourage the development and growth of renewable energy in the state of Utah. HEAL has worked with the Utah legislature, local municipalities, state agencies, and private citizens to formulate policy to benefit renewable energy in the state.

2. HEAL is a grassroots organization which helps inform Utah residents of issues related to and concerning developments in the renewable energy sector. HEAL communicates those developments to its 16,000 Utah supporters on a regular basis.
3. HEAL is a strong advocate for state policies and regulation which help protect the public health and safety of Utah residents, which includes pursuing environmentally friendly energy policies. HEAL has determined that meaningful reductions in pollution and greenhouse gas emissions will benefit all Utahns, visitors, and businesses through improved public health, additional economic opportunities, long term energy price stability, and electric grid stability.
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. In Rocky Mountain Power’s filing, a “Cost of Service” study is presented which finds the costs of the net metering program exceeds the benefits it provides. The Utility then proposed a three-tiered rate structure as a response. The net of effect of this proposal is an increase in the costs to net metering customers.
7. Petitioner has not fully determined the specific positions it will take or the relief it will seek. HEAL’s positions will be based on information not yet presented. Current information provided by the utility does raise serious concerns
8. For example - Rocky Mountain Power’s COS and ACOS studies use a small sample size of net metering customers from 2014. This sample size gives an inaccurate picture of current net metering customers. The sample size maximizes costs while minimizing benefits of net metering. Distributed generation adoption has increased greatly among Rocky Mountain

Power customers since 2014. There is a much greater economic diversity of customers with more efficient homes, minimizing costs to the grid.

9. HEAL Utah has a significant interest in the above-captioned matter for the reasons set forth herein. As such HEAL's policy priorities may be substantially affected by the outcome of this docket.
10. HEAL's intervention and participation in the is matter will not materially impair the prompt and orderly conduct of these proceedings.
11. HEAL requests that all notices and filing in this docket be served on:

Michael Shea
Policy Associate
HEAL Utah
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Suite B111
Salt Lake City, UT 84101
michael@healutah.org

NOW THEREFORE, HEAL Utah respectfully requests leave to intervene in this proceeding and asks that the Commission enter an Order granting HEAL's petition to intervene enabling HEAL to participate to the full extent allowed by law.

Dated this 11th day of December 2016

HEAL Utah

By: _____
Michael Shea
HEAL Policy Associate