



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

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## Public Comments on Docket No. 14-035-114 in opposition to proposed rate change

1 message

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**Jeffrey Stone (drumtutor@infowest.com) Sent You a Personal Message**

Wed, Jul 26, 2017 at 5:55 AM

&lt;automail@knowwho.com&gt;

To: psc@utah.gov

Dear UT PSC,

Dear Utah Public Service Commission Chair LeVar, Commissioners Clark and White,

I strongly urge you to deny Rocky Mountain Power's request to impose punitive rates that would unfairly penalize Utah's rooftop solar customers.

Rooftop solar benefits all customers by reducing the need to build new polluting power plants, saving all customers money. Rooftop solar also protects our air and water by using clean, free sunshine as opposed to dirty fossil fuels. These benefits far outweigh the cost shifts alleged by Rocky Mountain Power, which at most amount to only a penny or two per month for average non-solar customers.

Utah should learn from neighboring states that have been down this road before. States where utilities succeeded in implementing similarly discriminatory rate designs like the one proposed by Rocky Mountain Power have suffered a near complete loss of rooftop solar development. This loss has meant less economic growth and fewer choices for customers. Rocky Mountain Power's plan to kill rooftop solar is the wrong path for Utah, a bad deal for customers, and hobbles Utah's vibrant solar industry.

Please reject Rocky Mountain Power's punitive rates for rooftop solar customers in favor of a rate structure that recognizes the enormous benefits that rooftop solar provides to all customers. Don't let Rocky Mountain Power's monopoly take away our rooftop solar!

cc: Cindy Crane, President and CEO, Rocky Mountain Power

Sincerely,

Jeffrey Stone  
2482 ½ Douglas St (Rear)  
Salt Lake City, UT 84106  
[drumtutor@infowest.com](mailto:drumtutor@infowest.com)  
(801) 487-0222

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PublicService Commission <psc@utah.gov>

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## Opinion regarding rate change and Docket No.14-035-114

1 message

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**Alex Chamberlain** <alex.chamberlain@gmail.com>

Wed, Jul 26, 2017 at 9:48 AM

To: psc@utah.gov

Dear Public Service Commission,

I oppose Rocky Mountain Power's proposal to change rates in response to the proliferation of Net metering customers. I believe their study justifying the change is imbalanced (counts lost revenue as a "cost" for instance, by considering the full retail-rate credits awarded to net metering customers among their "costs"), and deeply flawed. If a change is needed, please do it with proper, balanced data, not simply the cherry-picked information provided by very company poised to benefit from the changes. Thank you.

-Alex Chamberlain

[www.bluedesertphoto.com](http://www.bluedesertphoto.com)



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## Public Comments on Docket No. 14-035-114 in opposition to proposed rate change

1 message

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**Jennifer Desha (jennifer.desha@gmail.com) Sent You a Personal Message**

Wed, Jul 26, 2017 at 2:10 PM

&lt;automail@knowwho.com&gt;

To: psc@utah.gov

Dear UT PSC,

My husband and I have had grid-tied rooftop solar on our house since 2008. We installed solar to help the environment and encourage the solar industry, which is now thriving. I have attended meetings about rooftop solar and current efforts to stifle it in Utah. These rate increases would be wrong for the environment, for customers, the solar industry, and RMP's image. Solar is the future and attempts to stifle it are an effort to hold onto the polluting past rather than embracing the future. Consider the popularity of solar (I see it everywhere now!) and the damage to RMP's image if these rate hikes go through. This seems short-sighted to me and I can't help thinking other forward-thinking companies will soon be competing with RMP to provide better solar support. I am not anti-RMP as we have benefited from solar rebates and recently bought a Nissan Leaf with the RMP discount program. RMP does some good things, I just wish all the departments could get on board with helping the environment.

Dear Utah Public Service Commission Chair LeVar, Commissioners Clark and White,

I strongly urge you to deny Rocky Mountain Power's request to impose punitive rates that would unfairly penalize Utah's rooftop solar customers.

Rooftop solar benefits all customers by reducing the need to build new polluting power plants, saving all customers money. Rooftop solar also protects our air and water by using clean, free sunshine as opposed to dirty fossil fuels. These benefits far outweigh the cost shifts alleged by Rocky Mountain Power, which at most amount to only a penny or two per month for average non-solar customers.

Utah should learn from neighboring states that have been down this road before. States where utilities succeeded in implementing similarly discriminatory rate designs like the one proposed by Rocky Mountain Power have suffered a near complete loss of rooftop solar development. This loss has meant less economic growth and fewer choices for customers. Rocky Mountain Power's plan to kill rooftop solar is the wrong path for Utah, a bad deal for customers, and hobbles Utah's vibrant solar industry.

Please reject Rocky Mountain Power's punitive rates for rooftop solar customers in favor of a rate structure that recognizes the enormous benefits that rooftop solar provides to all customers. Don't let Rocky Mountain Power's monopoly take away our rooftop solar!

cc: Cindy Crane, President and CEO, Rocky Mountain Power

Sincerely,

Jennifer Desha  
883 E Northcliffe Dr  
Salt Lake City, UT 84103  
[jennifer.desha@gmail.com](mailto:jennifer.desha@gmail.com)  
(801) 558-2536

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

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## Net Metering

1 message

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**Travis Tabbal** <travis@tabbal.net>

Wed, Jul 26, 2017 at 2:14 PM

To: psc@utah.gov

I am writing to urge the commission to deny any changes to net metering in Utah. Solar users should not be discriminated against, they should be encouraged. There are many documented studies demonstrating increased value to the utilities and all ratepayers from distributed generation, while Rocky Mountain Power only considers direct costs to themselves.

Particularly in Utah, with much of our power generated from Coal and with air pollution often at unsafe levels, we should be doing everything we can to encourage clean generation. Not only do solar users generate clean power, they generate it at the point of use, so large portions of the energy are not wasted heating up transmission lines and transformers.

A similar proposal was enacted in Nevada, killing the solar industry there. It has since been reversed, demonstrating that it is a bad idea. We should learn from the mistakes of our neighbors, not try to repeat them.

A more recent study shows that at 10% adoption, the cost to the utility is approximately \$0.005/kwh. At most, a change that removes that amount from the credits applied to net metering customers after 10% of all power is generated by net metered customers seems reasonable. However, if we are going to do that, I request that the removal of credits in the Spring be removed. If I'm paying directly for my grid use, resetting my net metering credits seems like charging me twice.

Travis Tabbal  
Herriman, UT



**WESTMINSTER  
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July 26, 2017  
VIA Electronic Filing

Utah Public Service Commission  
Heber M. Wells Building, 4th Floor  
160 East 300 South  
Salt Lake City, UT 84114

Attention: Thad LeVar  
David Clark  
Jordan A. White

Re: Docket No: 14-035-114, Investigation of the Costs and Benefits of PacifiCorp's Net Metering Program

Dear Public Service Commission:

As a sociologist with deep interest in public policy – and a new rooftop solar owner – I have been carefully following the discussions around Rocky Mountain Power's proposed rate change to future solar customers. I have been impressed with both the number of comments submitted to the Public Service Commission from the general public and the depth of knowledge exhibited by many. I would like to draw from my own expertise as a social scientist to raise concerns about some of RMP's claims.

Amidst the many details contained in the documents submitted by representatives of Rocky Mountain Power, I was most interested in those submitted by Robert Meredith, currently working for RMP as Manager of Pricing and Cost of Service. One important part of Meredith's job has been to verify that the cost of service analyses – which help justify the new, three-tiered rate structure that RMP is proposing – were done according to "Commission-approved standards." Part of this analysis includes developing a standardized production profile of net metering customers. Meredith refers to the "Load Research Group's" study as the basis for selecting those net metering customers. Given the importance of the answer to the question of how much do net metering customers "cost" the utility, I read the Load Research Group's recommendations with great interest.

In short, I was impressed with their recommended methodology. They suggested a sophisticated, stratified sampling method, whereby the universe of net metering customers would be clustered into four groups, according to average monthly energy use. Each of the four strata were "weighted" in terms of their representation of the full universe of net metering customers and the energy needs associated with that population segment. Following this formula, they recommended the random selection of **62 respondents** – representing their respective strata – to participate in the study.



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In comparing Meredith's statement with the Load Research Group's study, two problems became immediately apparent. First, Meredith indicates that by December 2014, only **36 production profile meters** had been installed, resulting in a sample size that was just over half (58%) of the suggested sample size. With a sample of this size, it is highly probable that the sample was biased, over-selecting for some groups and under-selecting for others. Second, there was no information given on sampling. To the best of my knowledge, nowhere in his testimony does Meredith account for how the eventual 36 respondents were selected.

In short, the sample size fell far short of the recommendation, and there is no data in Meredith's testimony indicating that the stratified sampling method was used at all. Based on this, it is unclear how this data collection procedure still meets "Commission-approved standards." I would underscore the importance of these two issues, as developing a standardized production profile of net metering customers was crucial to estimates of how the proposed rate structure would impact future solar customers. If that profile was lacking – as is already apparent – or is systematically biased – as is possible – then it seems appropriate that the PSC ask RMP to initiate a data collection effort that is more valid and reliable.

I hope these points will assist the PSC as it weighs the heavy decision of the future of solar power in Utah.

Sincerely,

Julie Stewart, PhD