
Docket No.14-035-116

1 message

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Thu, Sep 25, 2014 at 8:24 PM

To: psc@utah.gov

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To: Public Service Commission of Utah

From: Stanley T. Holmes
Salt Lake City, Utah
stholmes3@xmission.comRe: Public Comment to Docket No. 14-035-116,
In the Matter of the Disposition of Remaining Unused Credits
Associated with Excess Customer-Generated Electricity

September 25, 2014

Dear Public Service Commissioners,

Thank you for this opportunity to submit comments on the disposition of year-end excess net metering (NEM) credits that have until now been "expired" from customers' accounts by Rocky Mountain Power / PacifiCorp.

My comments focus first on the status of residential net metering credits, but then also on the status of non-residential / commercial net metering credits that are similarly "expired" at the end of each energy year. Inasmuch as the 2014 Utah Legislature's Senate Bill 208 directed the Commission to investigate net metering generally, I think it seems useful to apply that approach here.

I also suggest that an optimum decision for the fair disbursement of excess net metering credits be delayed until the public and the PSC have had a chance to consider data and analysis yielded through testimony by all parties to Docket No. 14-035-114, which will investigate costs and benefits associated with Rocky Mountain Power / PacifiCorp's net metering program.

In any case, I think it would be useful for the Commission, in its response to public input to the present docket (# 14-035-116), to explain the initial rationale for having given Rocky Mountain Power permission to annually confiscate ("expire") residential net-metering NEM credits. Would you also please state whether you feel the initial rationale remains valid or if the rationale has changed? And, would you please explain how and why the year-end excess credits of residential NEM customers are treated differently from those of non-residential / commercial NEM customers?

With regard to the status of residential NEM excess credits, I think those credits should be returned to the customers who generated them to do with as they see fit. Failing that, the value of those credits should be placed in escrow pending the outcome of Docket No. 14-035-114. If at some point, a solar surcharge is adopted, the excess credit value that was "expired" from each NEM customer should be applied to that customer's surcharge before any additional revenue is taken from that customer.

If you decide to donate "expired" NEM credits to a low-income assistance program, the value of those credits should be combined with Rocky Mountain Power's Solar Incentive Program to provide solar equipment to low-income households and Title I schools. You may be aware that the \$50 million S.I.P. program --and especially the annual lottery-- doesn't really make a solar investment affordable for poor families. Solar NEM credits should be combined with a refocused S.I.P. to help low-income families participate in the generation of clean energy. Perhaps the utility would purchase solar pv equipment and install utility-owned equipment in low-income neighborhoods.

The actual need for additional revenues for existing low-income assistance programs should be assessed before any decision is made to fund those programs further. And since NEM customers --like all Rocky Mountain Power residential customers-- already contribute to the existing low income assistance programs, it doesn't seem fair to have solar customers pay those programs twice.

While the value of confiscated residential NEM excess credits is still relatively low, at less than \$11,000 for the past year, the addition of non-residential / commercial NEM "expired" credits might be used to help fund solar assistance programs for low income customers.

In your response to this and other comments, would you please disclose the value of all non-residential and commercial NEM excess credits "expired" by the utility this past year? And, would you please describe what Rocky Mountain Power has been doing with those expired credits?

As you proceed to consider different options for disbursing the unused NEM excess credits, I would appreciate your taking care to ensure that "expired" NEM credits only be applied toward the advancement of solar and other renewable energy projects in Utah, and that no options be considered that would transfer "expired" NEM credits value to any Rocky Mountain Power / PacifiCorp programs or activities that might use this clean energy asset to promote or perpetuate the utility's continued preference for, and reliance on, dirty energy: i.e. fossil fuels.

In summary, I feel that the "expired" credits value of all net metering customers should be disclosed. The decision I would prefer you to make would see "expired" credits returned to the customers who generated them. Failing that, if the value of the credits is directed to low income customers, those clean energy assets should be used to advance clean energy programs. What comes from solar should go for solar.

Thanks again for providing the public an opportunity to help inform your ultimate decision.

Best regards.



Holmes comment 14-035-116.pdf

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