



## Docket #14-035-71

1 message

stholmes3@xmission.com <stholmes3@xmission.com>

Mon, Jul 7, 2014 at 4:38 PM

To: psc@utah.gov

To: The Utah Public Service Commission  
From: Stanley T. Holmes July 7, 2014  
846 N. East Capitol Blvd., Salt Lake City, Utah 84103  
[stholmes3@xmission.com](mailto:stholmes3@xmission.com)  
Re: Rocky Mountain Power's Solar Voltaic Incentive Program  
... Docket No. 14-035-71

Dear Commissioners,

Thank you for this opportunity to submit a public comment on Rocky Mountain Power / PacifiCorp's rate-payer funded Solar Incentive Program, hereafter referred to as "the lottery." My family applied to, then withdrew from, the lottery this past February for reasons stated in the email copied at the end of this letter.

I urge you to withdraw authorization for Rocky Mountain Power (RMP) to continue the lottery past the current (2014) funding cycle. The lottery does not serve the best interests of RMP's residential customers generally, nor does it serve the interests of low-income families in the RMP service area. The \$50 million earmarked in SIP funding for 2013 to 2017 would better serve customers if directed toward significant, utility-owned investments in solar energy.

The SIP lottery should be halted this year for reasons that include the following:

Like the Blue Sky program, the SIP lottery puts "green" window-dressing on a utility portfolio that has marginal corporate interest in promoting renewable energy generation in Utah. Both programs are part of RMP/PacifiCorp/Berkshire Hathaway's agenda to keep Utahns hooked on corporate fossil fuels and the associated carbon polluted air. [Coal and gas form the core of RMP's fuel mix now and into the future.] Respiratory and other health care costs are among the social costs of carbon suffered by the general populace, and are costs that the PSC should begin giving more serious attention.

To add insult to injury, RMP gets renewable energy credits (RECs) for duping the public: RECs that help RMP avoid significant renewable energy corporate investments, since it is allowed to count Blue Sky private donations and SIP projects for much of its Utah RECs award. That includes the recently-proposed, Blue Sky funded 2 MW solar farm. The SIP program itself is a clever ruse, with RMP turning away roughly 80% of solar lottery applicants [845 kW approved; 5,232 kW rejected], then having the audacity to "work the media" with claims to being a force for renewable energy in our state.

The SIP is to RMP as lipstick is to a pig.

The SIP lottery program discriminates against low-income residential customers. The PSC should investigate the socioeconomic demographics of applicants to the lottery. I predict that you will find very few applications from low-income customers, because most could probably not afford to purchase solar even with the SIP rebate.

I contend that RMP's SIP lottery helps deny poor Utahns access to clean energy for themselves and their neighbors. The PSC should survey low-income neighborhoods to find out how many families would have solar panels installed if it was affordable.

Rocky Mountain Power should stop the lottery and divert the remaining balance of funds to purchase of its own (utility-owned) solar pv equipment that can be leased to low-income families. RMP could also dedicate toward low-income solar leasing the value of year-end NEM credits it now confiscates from NEM customers. Let RMP step up to the plate for low-income families that want to be part of America's clean energy future. At the same time, RMP would be making a real corporate investment in solar equipment and thereby earn its RECs in a way people would recognize as legitimate.

The PSC should deny Rocky Mountain Power the authority to spend any more money on the Solar Incentive Program. Monies not committed to the 2014 program should be held in escrow pending the PSC's determination of a future course that will best serve the public interest.

Also, regarding the following from RMP's report: Due to the structure of the program, this report will not provide all of the information requested by the Commission. The PSC should require Rocky Mountain Power to answer accurately and completely all questions and concerns raised in this letter, plus any additional "information requested by the Commission" and through the public comments process. The utility's position that it cannot, need not, or will not provide requested information is not acceptable and should be considered grounds for at least placing "on-hold" continued approval of the program.

Thank you for your kind attention to the foregoing.

Stanley T. Holmes

Date: Mon, 3 Feb 2014 17:37:32 +0000 [02/03/2014 10:37:32 AM MDT]  
From: Utah Solar <[Utahsolar@rockymountainpower.net](mailto:Utahsolar@rockymountainpower.net)>  
To: "stholmes3@xmission.com" <[stholmes3@xmission.com](mailto:stholmes3@xmission.com)>  
Subject: RE: Withdraw Solar Incentive Program Application RMP-10397  
Headers: Show All Headers  
Per your request, we have withdrawn you from the lottery for the 2014 Utah Solar Incentive Program.

Thank you  
Erik Anderson

-----Original Message-----

From: [stholmes3@xmission.com](mailto:stholmes3@xmission.com) [mailto:[stholmes3@xmission.com](mailto:stholmes3@xmission.com)]  
Sent: Sunday, February 02, 2014 8:46 PM  
To: Utah Solar  
Cc: [slunt@gardner-energy.com](mailto:slunt@gardner-energy.com); Curtis Anderson; Sarah Lunt  
Subject: Withdraw Solar Incentive Program Application RMP-10397

Dear Mr. Zappe,

Please withdraw our application # RMP-10397 from the S.I.P. lottery immediately upon your receipt of this email.

We cannot in good conscience participate in the program given Rocky Mountain Power's current request to penalize solar- and wind-generating customers with a special monthly surcharge.

We question Rocky Mountain Power's commitment to a clean energy future, and do not wish to appear beholden to you in any way.

Thank you for withdrawing our application for the S.I.P. grant which we would, in any case, now decline to accept.

Best regards.  
Stanley T. Holmes  
Rebecca A. Horn  
846 N. East Capitol Blvd.  
Salt Lake City, Utah 84103

Quoting PowerClerk Notifications <[utahsolar@rockymountainpower.net](mailto:utahsolar@rockymountainpower.net)>:

[Hide Quoted Text]  
RMP-10397

Hi Rebecca Horn

Thank you for applying for Rocky Mountain Power's Utah Solar Incentive Program. Your application has been received. All participants will be notified of the results no later than 5 p.m. on February 8, 2014.

Thank you for being a Rocky Mountain Power customer.

Jason Zappe  
Customer Generation