PublicService Commission <psc@utah.gov>

Docket #16-035-T14 Public Comment

1 message

Michael Bard <mdbard@me.com> Sat, Dec 3, 2016 at 12:02 AM
To: psc@utah.gov

Dear Commissioners,

I am opposed to PacifiCorp-RMP's "Advice No. 16-13", filed Nov. 9, 2016, that would change the rate structure for rooftop solar customers. I urge the PSC to deny the utility's fast-track request and require it to use the normal rate-making process for its proposed changes.

It is a greedy money grab by RMP. I do pay a connection grid fee, just like every other customer. If that connection fee isn't enough for grid maintenance, then raise it for everyone, because the rest of the bill is for energy usage. Don't make solar customers pay extra fees. I also produce more energy than I need and RMP pockets that extra energy, as I never see a penny for my extra production. I also produce energy at the peak energy usage time, actually taking stress off of the power grid. I contribute to cleaner air quality and a cleaner environment. You want people to keep purchasing your energy? Then please give us more clean, renewable energy. That is what we want. Don't punish us for doing for ourselves what you should be doing... investing in a sustainable future and cleaner world for ourselves and future generations. Save Solar in Utah! This proposal will essentially discourage solar adoption and kill a new industry and valuable jobs.

Thank you for accepting public input, though the deadline should be extended. I respectfully request the PSC, in the interests of ratepayers and the Utah public, to reject PacifiCorp-RMP's current rate change request.

Sincerely,

Michael Bard
1488 East 3115 South
Salt Lake City, UT 84106
mdbard@me.com

PublicService Commission <psc@utah.gov>

Re: Public comment on RMP increase for solar users

1 message

James Brown <james@hmpg.net> Sat, Dec 3, 2016 at 2:05 PM
To: PublicService Commission <psc@utah.gov>

Attached are my comments regarding dockets 14-035-114 and 16-035-T14; Rocky Mountain Power's request for a tariff change for rooftop solar. Please enter these comments into the public record for the PSC.

Thanks,

- James

On Fri, Dec 2, 2016, at 07:39 AM, PublicService Commission wrote:

> You may comment via email to psc@utah.gov or by regular mail. Our mailing address is:
> Public Service Commission of Utah
> Heber M. Wells Building
> 160 East 300 South, 4th Floor
> Salt Lake City, UT 84111
>
> Please refer to Docket No. 14-035-114 or Docket No. 16-035-T14 on our website to find further information regarding these matters:
> http://psc.utah.gov/utilities/electric/elecindx/2014/14035114indx.html
> http://psc.utah.gov/utilities/electric/elecindx/2016/16035t14indx.html
>
> On Thu, Dec 1, 2016 at 9:56 AM, James Brown <james@hmpg.net> wrote:
>> https://www.rockymountainpower.net/about/nr/nr2016/proposed-net-metering-changes.html
>>
>> In this article Rocky Mountain Power says they are applying for a change in the rates charged to rooftop solar customers. I'd like to comment to the PSC on this matter. How do I go about that?
>>
>> I looked at the calendar on your website and I don't see anything that looks like it would be this item on your agenda. Can you point me at the correct docket and let me know when this will be considered?
>>
>> Thanks,
>>
>> - James

RMP PSC comment.pdf
129K

James Brown
255 W 2000 S
Orem, UT 84058

December 2, 2016

Re: Dockets 14-035-114 & 16-035-T14; Rocky Mountain Power's request to change tariffs for rooftop solar customers

To the Public Services Commission,

I am writing to request that Rocky Mountain Power's (RMP) rate request under Dockets 14-035-114 & 16-035-T14 be denied in its totality.

If the PSC feels that RMP's rooftop solar customers are not paying their fair share, I strongly encourage the PSC to conduct an independent study. Regardless of their intentions, RMP is clearly biased in this matter since they are, themselves, a solar provider. That bias, I believe, has leaked over into their report.

I was alerted to RMP's tariff request after finding an article on the RMP website (see https://www.rockymountainpower.net/about/nr/nr2016/proposed-net-metering-changes.html). This article has several glaring logical and financial errors. I hope that pointing out these errors is sufficient to make it clear to the PSC that RMP is not acting in the best interest of their own customers nor Utah's citizens in general. Instead, it seems clear to me that RMP is punishing rooftop solar customers in order to protect their own profits and to ensconce themselves as a solar power monopoly.

RMP proposes to turn residential solar customers into commercial customers by moving them to a tiered rate structure. This seems designed to punish solar producers, particularly those who make less than 100% of their own power. Rather than reward customers who are helping RMP during peak demand periods, they seem intent on punishing the very people who are helping RMP balance the load. This seems illogical on the face of it. Solar produces power at the exact time when RMP needs extra capacity. Further, this generation is near the consumption point so it is the most efficient power RMP can buy or produce because it has to travel the shortest distance.

Next RMP asserts that rooftop solar customers are underpaying the actual cost of service by $400 per year. On the face of it this seems absurd. RMP is insisting that just to have a connection to the power grid is well over $400 per year in ongoing costs. I certainly don't feel I receive $400 worth of value from RMP, on top of the actual energy they provide. Further, that would suggest that only 2/3 of my normal energy bill from RMP (I pay approximately $100 per month) actually goes to energy and the other 1/3 goes to overhead (maintenance, administrative, etc.).

Comparing this to other electrical companies in the mount west reveals that a charge of $400 per year would be several times more than other companies charge. For example, the city of Longmont, CO says:

> *A $10.40 standard monthly service charge also appears on customer utility bills to cover the cost of distribution power lines, transformer expense, substation expense, meter overhead and maintenance, meter reading, billing and customer service. These represent the fixed costs to provide service to each customer regardless of usage amounts.*

Source; http://www.longmontcolorado.gov/departments/departments-e-m/longmont-power-communications/electric-service/rates-and-fees/residential-rates

This would amount to a total of $125 per year. That's a far cry from the $400 per year that RMP suggests that rooftop solar customers are underpaying. Keep in mind that this $400 is in addition to the $6 per month that RMP already charges residential customers to cover "*a portion of the fixed costs associated with having single phase electric service, including the cost of meters and meter reading, preparing and providing a bill, and other administrative costs*" (quoted from RMP's own description of their 'Basic Charge' on their website). Is RMP so inefficient that they have nearly four times as much overhead expense as a little town in Colorado? I thought there were supposed to be "economies of scale" with large power companies. If so, RMP should be significantly cheaper, not four times more expensive.

Further, this assertion, that solar rooftop customers are not paying their share, would suggest that as customers conserve energy (by, for example, installing LED lighting, increasing window R values, using automatic lights, etc.) they too, would not be paying their share. That calls into question RMP's various programs designed to do exactly this, to reduce the amount of power individual home owners consume.

RMP claims, later in the article, that they can purchase electricity from large solar farms for 3 to 4 cents per kWh. Let me explain how this is in direct conflict with their other statements.

If RMP is buying power at 3 to 4 cents per kWh and selling it to me at 9 cents (that's the lowest cost shown on my summer bills), then their overhead number of $400 is way out of line. Using these numbers the cost of electricity is 1/3 of the bill and overhead is 2/3 of the bill. This is the exact opposite of the numbers we calculated above. Both calculations can't be correct.

Next, if the overhead RMP says I need to pay as a residential customer is over $400 per year, what is the overhead for a large solar farm located in a remote area of Utah? That can't have been inexpensive to build initially (initial capital investment of roughly $400 million). Further, the infrastructure to get power from that plant onto the grid should be allocated 100% to that plant since it exists exclusively to connect that plant and isn't shared with anyone else.

By contrast, the capital cost to RMP to build a residential rooftop solar generation is exactly $0 since it is borne entirely by the home owner. Likewise the incremental infrastructure cost for RMP to acquire that power is also $0 since the home is already connected to the grid. Lastly the ongoing infrastructure cost is shared by everyone in the neighborhood since the infrastructure exclusively dedicated to each individual home is just a few dozen feet of power cable. All of the other components (transformers, power poles, etc.) are all shared by neighbors.

RMP's claim that they can purchase electricity from solar farms for 3 to 4 cents per kWh doesn't match up with their own announcements about their solar plant. On Feb 15,2016 RMP announced that they were building a 20 megawatt solar farm near Holden, Utah. In that announcement they say:

> *Residential customers will receive a "locked-in" generation rate of 7.7 cents per kilowatt-hour, plus about 4 cents for transmission and distribution, totaling 11.7 cents per kilowatt-hour.*
> Source: https://www.rockymountainpower.net/about/nr/nr2016/subscriber-solar-location.html

Clearly their cost for solar power is higher than the stated 3 to 4 cents because just the transmission and distribution cost is 4 cents according to RMP's statement. That would be on top of the actual cost of generation, maintenance, administration, etc.

The net metering program offers RMP a less expensive alternative to provide solar power to neighborhoods. With net metering, RMP is only paying 9 cents (what they are crediting rooftop solar customers for excess power generated) while claiming that their cost is 11.7 cents from their own power plant.

Lastly RMP says in their article that "*net metered customers still rely on the grid 23.99 hours of each day.*" This is utter nonsense and completely irrelevant to the discussion. I believe everyone relies on the grid 24 hours per day. I don't know of anyone who has zero electrical usage in their home or business at any point during the day. We all have nightlights, refrigerators, televisions, computers, rechargeable devices, thermostats, security lights, smoke detectors, etc. that are constantly consuming power. Even ignoring that, I don't think anyone wants to turn on a light switch at any time during the day and not have power so everyone 'relies on the grid' 24 hours per day.

The inference, however, is that somehow rooftop solar customers put more load on the grid than non solar users. This, too, is nonsensical. Solar generation, obviously, only happens during daylight hours, not 23.99 hours per day. At times other than when power is being generated, solar customers put the same load on the grid as they did before they installed solar. Further, the wires don't know or care which way electricity is flowing. The amount of power in the system is fixed at any given time, whether it comes from RMP or from rooftop solar doesn't cause any more or less strain on the infrastructure.

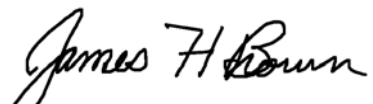
Lastly, RMP says they will change rates only for new net metering customers. How long will it be before they or others raise the argument that having two different rate plans based solely on when you signed up is unfair? This will severely disadvantage those who purchased solar based on a cost/benefit analysis using the current pricing structure.

In summary, the benefits of neighborhood rooftop solar to RMP far exceed anything RMP can possibly do on their own. RMP should be rewarding rooftop solar customers, not trying to apply punitive pricing models to discourage solar and protect their monolopy. Some of the benefits to RMP and the community are:

- Reduced dependence on non-renewable energy sources
- No capital cost to RMP to expand their generation capacity
- No additional administrative, infrastructure, or maintenance cost to RMP
- Peak generation capacity exactly mirrors peak demand
- Zero emission power generation
- Encourages users to invest in alternative fuel vehicles

Again, I urge the PSC to deny RMP's request entirely. Further, I encourage the PSC to conduct an independent study of the costs and benefits of rooftop solar to RMP and Utah in general.

Sincerely,



James Brown

PublicService Commission <psc@utah.gov>

docket 14-035-114 16-035-T14

1 message

Chris Barker <ctbarker@gmail.com> Sat, Dec 3, 2016 at 7:10 PM
To: psc@utah.gov

I would like to voice my objection to the solar rate structure proposed by Rocky Mountain.

Solar is the future of electric generation, and it will eventually completely change the RM's model.

I just re-read the SL tribune November 21, 2015 Op-Ed and it is very well said. Please read it

I am an existing Solar user who put enough solar on my roof to cover only 60% of my bill - I'm still paying quite a bit to rocky mountain for the service they deliver to my home.
I'm paying about $100 more with solar up, than I was before.
Some of my thoughts.

- According to many prognosticators, Solar will become the cheapest energy around, and it threatens Rocky Mountain - they have a vested interest in squashing competition.
- Cool Keeper
  - Allegedly, the Cool Keeper program is designed to keep the energy grid from being over-taxed during peak time
  - If that is the case - Solar on homes, which is generating some of its highest levels of the day, at the hottest times of the day - is doing way more to un-tax the grid than the cool keeper program is.
  - The Op-ed says this part particularly well.
    - "Solar net-metering customers push their extra clean energy onto the grid during peak hours when the air conditioning is turned up, businesses are open, and demand is high. Rocky Mountain Power can then charge the neighbors of that customer market rate for consuming this cleaner power — all without having to invest in infrastructure to generate that energy themselves or pay the cost to move it across half the state from one of the distant generation sites. This local generation has a real value: it can reduce the amount of money Rocky Mountain Power needs to raise in customer rates for energy generation. In fact, during the PSC proceeding, clean energy advocates submitted detailed expert testimony demonstrating that rooftop solar is by far the cheapest resource available on Rocky Mountain Power's system."
- Not every Solar is equal.
  - For years, RM has sent me letters telling me I'm using a lot of electricity (which I do, but I'm not wasting electricity)
    - That was part of my incentive to get solar - because RM encouraged me to do my part by reducing - but I've already done all the efficiency things (I have two kitchens, two washing machines, two freezers, many more occupants than 'my neighbors' RM compared me to....)
    - My solar array is designed to handle 60% of my load (with 30 panels up)
      - This takes me out of the highest rate tier, but I still use a lot of electricity.
    - To increase my rate on the remaining 40% is only self serving and does not address any real need.
      - I'll end up paying far more than my fair share.
    - I'm semi OK with paying the 'fee' that they have proposed, but the rate increase just because a person has a Net Meter, doesn't take into account how much electricity they are actually still using.

The vast majority of Utahan's do not want you to grant this increase, please consider what is best for the people of utah & even the air we all breathe, not for Rocky Mountain.

Chris Barker
South Jordan
801.254.8902

PublicService Commission <psc@utah.gov>

Docket #16-035-T14 Public Comment

1 message

John Whittaker <jdwhitta@gmail.com> Sun, Dec 4, 2016 at 9:14 AM
Reply-To: jdwhitta@gmail.com
To: psc@utah.gov

Dear Commissioners,

Please oppose/reject RMP's request to fast-track their request to penalize homeowners with rooftop solar arrays without due process. If the PSC decides to grant RMP's request for solar fees then they need to be fair and equal instead of a "one size fits all approach". Net meters are already in place so RMP and the PSC should be able to come up with a more equatable approach.

Attached are my comments to Jon Cox's (RMP) Nov 29th email concerning his "Net Metering Update".

Thank you for listening

Regards,
John Whittaker
Main: 801-582-4374
Fax: 801-883-0944

RMP Net Metering Arguments.pdf
53K

From: "Cox, Jon" <Jon.Cox@pacificorp.com>
Date: November 29, 2016 at 11:05:19 AM MST
To: "Cox, Jon" <Jon.Cox@pacificorp.com>
Subject: Net Metering Update

Representatives:

I have spoken with many of you about the recent Public Service Commission filing by Rocky Mountain Power. Please do not hesitate to reach out with questions or concerns you might have about this important issue. A few key points:

- Today, the wholesale market price for solar power generation is approximately 3-4 cents per kWh thanks in part to large-scale solar farms like the ones we see throughout rural Utah. By comparison, **Rocky Mountain Power is required to reimburse rooftop solar customers at nearly three times the market rate.** This hasn't always been the case. From 2002-2008, Utah net metering customers only received the market rate for their excess solar production.

RMP does not reimburse solar customers. They provide KWh credits on the daily solar production. This credit is zeroed out once a year on April 30 – "use it or lose it".

RMP can make investments for their shareholders but when I invest in the future of my assets I am penalized by RMP for my investment. My investment was made based on RMP's Net Metering program. If RMP changes the agreement that was in place when my array was installed then how confident can I be that RMP won't change their mind again and eliminate the grandfathered systems? This move by RMP simply is another attempt to monopolize a utility that is essential to all the people to benefit one company.

Based on $.17/KWh (including the other charges that RMP already adds to the monthly bill, i.e. "Renewable Energy Adjustment", "Energy Balancing Account" and "Customer Efficiency Services") it will take 14 years to pay off my system. With another $9/mo it will take 15.5 years. This does not take into account the degradation of the solar panels at 1%/yr or the cost of servicing the system over those years.

- If a solar customer wants to use power in the evening (our peak demand) or on a cloudy day, it is reasonable to expect them to pay their fair share to maintain the grid. Our proposal to the Public Service Commission accomplishes that objective with a $9/month increased fixed charge coupled with a demand charge based on their use of the grid. Those who have a higher demand on the grid will pay more than those who don't. **The average increased cost under RMP's proposal for new solar customers would be approximately $20/month.** Customers with rooftop solar will still save money on their energy bills—about 35 percent compared to non-solar customers. And unlike other states, we are only proposing this change for new solar customers, not existing users.

What about those who use very little electricity and don't have solar? Shouldn't they pay a fee and a demand charge to pay for the infrastructure? Is this really fair to solar customers?

Annually, only 21% of our home's energy needs are supplied by solar. Increasing the current service fee from $6/mo to $15/mo (125% increase) for solar customers is excessive. Also, solar production is minimal 6 months of the year. The current proposal penalizes smaller solar user and benefits larger solar user. These policies discourage homeowners from installing solar as a backup to RMP if the grid goes down. The PSC/RMP should implement policies to encourage solar and not limit individuals to only one source of power given the dependency we all have on electrical power. RMP's proposed fee doesn't take into account that not all solar customers have battery backup systems to use their stored energy at night which is an important reason to keep Net Metering in place. If the PSC decides to penalize solar customers for their investment then **the fee should be based on the size of the solar system, whether the system has battery storage and the percentage of solar annual production verses customer usage. A FLAT RATE FEE IS NOT A FAIR APPROACH TO THIS ISSUE.**

- Other utilities in Utah have already adopted similar changes for their net metering customers. For example, Bountiful solar customers pay a fee for grid maintenance. Customers in St. George and Logan are simply paid the market rate for their excess solar production. Several Utah cities don't pay anything for excess solar generation because they don't need the extra electricity at a time of day when customer usage is low. **Commercial solar customers in the RMP service area already use a rate structure very similar to our residential proposal**. We continue to see new commercial net metering customers sign up at this rate, and we expect the same with our residential customers.

We have property in St George and have decided against installing solar because of their refusal to implement net metering. St George is located in a solar rich area, not like northern Utah. Large monopolies such as RMP should be encouraging homeowners to install solar, as they have in the past, to help reduce pollution in the Salt Lake valley and reduce demand during summer's high demand. The PSC should object to this attempt to control homeowner investment in solar energy. S.D. 208 reflects bad policy in a State that has serious pollution problems.

- We currently have one of the lowest electricity rates in the country, and as a company we want to keep it that way. Unfortunately, a significant cost will have to be paid by non-solar customers unless this grid maintenance inequity is resolved. **Not acting now will inevitably result in increased power costs for all customers.** This was the reason the 2014 Legislature passed S.B. 208, which directed the Public Service Commission to "determine a just and reasonable charge, credit, or ratemaking structure" for the net metering program.

"Significant cost will be paid by non-solar customers", "increased cost" - really? These are typical RMP scare tactics to raise rates on their small competitors/customers.

- **Rocky Mountain Power is supportive of an energy future that includes increased solar power.** We currently purchase nearly eight times more solar power from

Utah solar farms than we do from net-metering customers, much of that built in just the last few years. We expect both of those numbers to continue to rise in the years ahead.

I have pulled individual energy reports for many of you to show what this proposal would look like on different kinds of homes with varying sizes of solar installs. I am more than willing to do the same for any of you or your constituents. As always, don't hesitate to call with questions or concerns. Additional information and a FAQ list can be found on our website, utahsolarworks.com/net-metering.

Mr. Cox is saying that the net metering program doesn't constitute much of the solar RMP buys, so leave Net Metering alone. Last summer I watched an interview with David Esklesen from RMP who suggested offering an incentive program to those who used excessive power. Now RMP wants to penalize those who have or want to contribute to reduce the load during peak load summer demand.

Another contradiction is the use of RMP's program to control customers A/C units during peak demand. This program only benefits RMP by shutting off customers A/C units when the customer needs it the most. Then the customer has to pay more by using more energy to make up the loss of cooling (walls, furniture, rugs, insulation, etc.) within the customer's home. Solar performance is at its peak during these times to help eliminate "brown outs". RMP has always based their arguments for rate hikes on increased demand. Now that solar customers are lessening the load/demand and RMP has their own solar farm(s), RMP is asking for a rate hike because of decreased demand.

Why penalize those who are trying to reduce their carbon footprint, help relieve the pollution in our valley and reduce the summertime energy demand?

RMP needs to go through the PSC process substantiating their claims before make a request to fast track additional fees from the public.

Dan Jones & Associates just released a poll showing 76% of Utahn's oppose RMP penalizing rooftop solar customers extra fees. Granting RMP's request is contrary what RMP's customers want. http://utsolar.org/help-save-the-future-of-solar-in-utah/survey/

Jon Cox

Vice President | Government Affairs

Rocky Mountain Power

C: 435-851-4457

jon.cox@pacificorp.com

PublicService Commission <psc@utah.gov>

Docket 14-035-114 16-035-T14

1 message

Victor Pezzolla Sr <vhpezzolla@gmail.com> Sun, Dec 4, 2016 at 10:24 AM
To: psc@utah.gov

Dear Commissioners,

I've read over a few emails that support the RMP solar rate increase and believe their premise that solar customers greatly benefit over non-solar customers is incorrect. The decision to purchase solar is a large financial long-term investment in their property (10k-20k) with no guaranties for savings or even break-even. As with all investments, it could incur unexpected costs and needs to be managed. I believe the majority of the people that make this investment in solar want to do their part to help with the pollution issue. This same mentality supports other ways to clean the air (transit, EV cars, walking trails etc...) and other healthy alternatives. The proposed RMP rate increase will kill the solar market here just like its sister company (NV Energy) did in Nevada last year when its new solar installs dropped by 99% (pulled from desert news article published 11/17/16). I understand RMP's responsibility to its stockholders in wanting to stop alternate energy sources but the stockholders good doesn't always represent the public good. The decision to purchase solar and invest long-term in our valley is a significant one. When the winds stops or we have an inversion, everyone dislikes the pollution and wants to get away. i strongly request you send a clear message that clean solar power is welcome in the valley so we can retain people willing to make long-term investments in the valley's future and stay here to support an agenda toward cleaner and healthier alternatives for the public good.

Thank you,
Vic Pezzolla Sr
Herriman, Utah

PublicService Commission <psc@utah.gov>

Docket #16-0350T14

1 message

Mark Langheinrich <Mark.dvm@hotmail.com> Mon, Dec 5, 2016 at 2:22 PM
To: "psc@utah.gov" <psc@utah.gov>

Hello,

I am writing to express my concerns regarding RMP's proposed increased rates to net metering customers. Rooftop solar provides a great net benefit to the state. Not only does RMP get to use excess energy produced at a much lower rate than they charge customers purchasing solar from them, but it reduces the amount of electricity they must produce. Moving away from fossil fuels also provides a benefit to Utah in helping our terrible air quality. The state should continue to promote citizens making the choice to move to solar which is good for all of us.

Thank you,

Mark Langheinrich

PublicService Commission <psc@utah.gov>

Docket No. 16-035-21

1 message

David Whittaker <davidbwhittaker@hotmail.com> Mon, Dec 5, 2016 at 3:07 PM
To: "psc@utah.gov" <psc@utah.gov>

Public Service Commision,

This email concerns Docket No. 16-035-21, up for review on Dec 13th. RMP's attempt to vastly increase service fees and eliminate Net Metering for home solar HAS NOT BEEN PROVEN TO SERVE THE PUBLIC GOOD. In order for RMP's claims to be assessed that RMP needs more money for infrastructure, transparency is key. Instead of asking themselves what the customers will pay, they need to justify rate increases, etc. with their customers by providing specific financial information about RMP.

As a public utility, RMP is responsible to us, the taxpayers & customers. The PSC is the public's voice. At this time, please reject RMP's requests for rate increases and elimination of net metering.

Thank you!

David Whittaker

davidbwhittaker@hotmail.com

801-655-3492