



PublicService Commission <psc@utah.gov>

16-035-T14

1 message

Marc Udall <mudallmd@gmail.com>
To: PSC@utah.gov

Mon, Dec 5, 2016 at 6:25 PM

Dear Commissioner,

I understand there is to be a public hearing on a proposed rate increase for Solar electric users, Docket # 16-035-T14.

I would like to speak against the proposal to increase rate on new solar users. I am happy to come in person. I am not totally opposed to the idea, but the timing of it is a problem for people like me.

I think it is important to explain my situation and that of others just as much as Rocky Mountain Power (RMP) will be explaining their situation to you. I have been pondering solar for some time, in large part spurred on by messages from Rocky Mountain Power and Questar. They have sent me many letters stating that our home is one of the bigger users of energy for a home its size in our neighborhood. (You may have received such letters.) I take them very seriously. I asked my self why would they send me such a letter? I firmly believed they want me/need me to conserve. They need to serve others, and the message I heard was "I am taking more than my share. Please cut back." Not to mention the confirmation monthly in my power bills. Still, I really do not want to be a burden on the system and make it hard for others.

Because of these drivers, over the years I have attacked our 37 year old home by insulating my roof twice, 4 years ago we changed furnaces;we had a boiler and went to small forced air units and several heat pumps to make more efficient zones. We replaced all the windows in our house to be more thermal efficient, thereby not just saving gas but fans do not

have to run. I have replaced all of our lights with compact fluorescents and as soon as we got home from an LDS mission a year ago I replaced all of them with LED's. We have several pumps and compressors that use lots of electricity and we have replaced the ones we can with more efficient and variable speed pumps. I have several electric water heaters for water troughs for animals and I will be replacing them with geothermal hopefully next year. However, I have limited resources, and I cannot come to you for more money. Three years ago we replaced our old air conditioner units with a much more modern and efficient single unit. We have zoned off several rooms that do not need so much air conditioning and installed their own small high efficient units. We have changed out clothes dryers and stove that were electric and put in gas, not an easy job with plumbing and all. We have installed a passive solar water heater. We are changing out appliances as we can. We put in sky lights in the barns so we do not need to use electricity to see during the day time.

I am telling you this because I want you to believe that I and others like me have taken their request to conserve and make power available to others *very* seriously. I have spent a lot of my capital to help their cause and mine as well.

With all of this I have reduced my bill by half while rates have increased, and have continued to get letters saying I am a large user of power. (I have an old home, it will never be efficient like the new ones.) I have nearly run out of things I can do to conserve. I really cannot recall when the last letter came, I believe it was early this year; however, I am still motivated; my bills are still higher than I would like.

Other than the geothermal water troughs the only thing I could think of was to go solar. This is not a small undertaking. There are many fly by night companies out there that will install solar at "no cost to me." There is no free lunch. With RMP not in the market people are not served as well as they could be and it is to RMP detriment as well. I have listened to a number of them and then decided to go with a local contractor that I could work with, and who could service my system down the road. Sizing our

system was not easy and the "free approach companies" gave us some misdirection. (They have little incentive to size the system right, and the homeowner does not know if they have.) I am telling you this so you will understand that this is not something that I/we (at least some homeowners) decide on a whim and do, and do it now. Nor can it be just shut off in a matter of days and send all of the supplies back even if we wanted to do so. Not to mention getting the money together.

In the middle of the project to have this rate change sprung on us is not very fair. If there is to be a change it needs to be telegraphed ahead so that those that are in the middle of a project do not get punished. Rocky mountain power would not like the rules changed on them concerning a project they are counting on just as it is coming on line. I am sure they would expect the same treatment I am asking if the tables were turned. I may be small potatoes compared to them, but I have and am spending a great deal of my disposable income to help them with conservation.

Which brings me to ask a question, Why, if conservation is helpful to RMP in providing power to more customers is not solar power the same. It is the same sort of concept. I would think that having people spend money to provide generation capacity that they do not have to provide and on existing grid that does not have to be built, allowing RMP to expand their market and with less capital out lay would be a boon to them. I thought that was what I was doing by heeding the call to conserve. How much did that solar farm and transmission lines that they just built cost? I expect they said they needed more production capacity. Some of their customers that are ahead of me are in effect giving capacity to them for free.

I have liked the service I have received from RMP. I have bought into helping my neighbor not just in conserving; have given RMP thousands of extra dollars over the years in their monthly donation plan to help others that have trouble paying their bills. Unlike the "free systems" I have no intention of installing a system that produces more power than I use. I have sized my system to still have me pay a monthly bill. However, I am about one battery bank, one more rack of panels and a small generator

away from being able to go off grid. I suppose if the approach is going to punitive I can be pushed.

The argument about not paying taxes that go to schools in sales tax, is suspect. I suspect they also try to reduce their tax burden every chance they get. The loss of tax revenue is not their concern. The legislature will take care of that if it is a problem. To further the argument, I am paying sales tax on tens of thousands of dollars in a lump and the net present value of that is actually worth a great deal. RMP will take a number of years to collect that money from me and pay that amount of tax. For example my system is \$60K and much of that will be taxed. I have paid RMP \$166k in 37 years. At that rate it will take a little under 10 years for RMP to collect that tax money.

I have paid my share of infrastructure and now again privately so they can have power to sell elsewhere. The power I do not use does not just not happen. It is sold to new customers, or put on the grid to be sold at potentially higher prices elsewhere. If it were not so why would they build a new plant. The taxes on the power are still paid. This is not changed anymore than it was by following RMP's plea for conservation. Again for example when I put in my geothermal water heaters I will use less electricity. Am I a cheater because I have allowed that power to be used by someone else?

If I could I would speak to RMP about becoming adversarial to solar electric. I cannot really understand why RMP has vacated this market space to the fly by night guys. The systems they wanted me to buy were in the end over sized by a minimum 20%. If you, RMP, were in the field then systems might have been sized right, people would mostly all still be buying power in the low first level of charge 8.9 cents. By your choice you have left the market to companies that have used you and now you wish to punish us for your neglecting a portion of the power generating field? I do understand that you do have to stay in business, I do not want to sever ties with you either. Go forward don't try to go back and recoup what you gave up, it will be a big public relations problem for you down the road.

This technology is not going to go away. It may have a major slow down

with the new administration and by rules here in Utah, but power made in the sunny west can and will be sold on the grid. Why not embrace it and be helpful instead of adversarial. Sure, build a big solar farm, that will appeal to some your customers. Why not have small ones as well. You would not have to do any house that asked for it. You can pick and chose the ones you want to work with, at your standard. If you were doing it then you could size the system right. If there were room ask for permission to install a few extra panels for your own production. In short order you could duplicate your farm many times over with minimal capital for transmission lines and guys like me would pay for some of it by already having the crew there working, and providing the base and land on which to build it, and some of the infrastructure at the house or business. Yes you may have more places to service but you service our homes anyway. Being more involved with us it better for you in the long run that being seen as distant and big.

Summary:

I am sorry for the long letter.

1. I disagree with the idea that conservation or rooftop solar power is a drain on our power system.
2. If the rate for rooftop solar does need to go up then it should be signaled clearly with enough lead-time that people that are in the process of investing (at the request of RMP to not use so much power) are not punished for doing what they have been asked to do.
3. I think instead of there being an adversarial relationship (in part the fault of RMP for vacating the field to others), it should be embraced and co-opted by RMP.
4. If the aim is to shut down the Rooftop solar industry it can be done; however, again a lead-time of 5-6 months with a clear signal needs to be given, (This may be moot because it may happen within the year at the federal level. Why does RMP want to be seen as the bad guys and be out in front on that side of this issue?)

Sincerely Marc Udall



PublicService Commission <psc@utah.gov>

Docket #16-035 T14 Public Comment

1 message

Joshua Herrera <joshuaherrera@icloud.com>
To: psc@utah.gov

Mon, Dec 5, 2016 at 8:56 PM

The Utah Solar Energy Association even wrote out a sample letter you can use:

"Dear Commissioners,

I oppose the recent proposal from Rocky Mountain Power, "Advice No. 16-13", filed Nov. 9, 2016, that would change the rate structure for rooftop solar customers. I urge the Public Service Commission to suspend the tariff and prevent it from taking effect on December 9 as Rocky Mountain Power has proposed. Rocky Mountain Power should be required to use the normal rate-making process.

I believe it is unfair for Rocky Mountain Power to raise rates for customers who wish to use rooftop solar. I am deeply concerned about the future of our planet, and I believe solar gives people access to a cleaner, more reliable source of energy. Utah's air quality needs to improve, and I believe rooftop solar should be part of that solution.

Thank you for accepting public input on this important issue. I respectfully request that you put the interest of ratepayers and the Utah public on equal footing with Rocky Mountain Power, and reject Advice No. 16-13.

Sincerely,
Joshua Herrera,
joshuaherrera@me.com
Park City, Utah

**PublicService Commission** <psc@utah.gov>

Docket #16-035-T14

1 message

Carrie Anderson <andersondvm2013@gmail.com>

Mon, Dec 5, 2016 at 9:09 PM

To: psc@utah.gov

Encouraging solar energy helps reduce our dependence on fossil fuels and helps to improve our state's awful air quality. I moved to Utah in March 2015 and had never had any respiratory issues prior to that. I thought it was appalling that our air quality over the last winter was so horrible that I couldn't see a street sign that was 20 feet in front of me, let alone the beautiful mountains, for which we attract many of our tourist population over the winter months. During the last winter, I had a severe cough the entire season, which I attribute mostly to the terrible air quality, as it cleared up when our air did. We need to rely on clean energy sources rather than fossil fuels, as our state is one of the worst in the country in regards to fine air particulates. This is resulting not only a large population of the residents in our state (particularly Salt Lake County) having health issues, but it could also affect our tourist attraction (who wants to ski in the mountains when all they see below them is smog?). People who spend money for solar should not be penalized when they are trying to make the state cleaner, and especially not so Rocky Mountain Power can have higher profits.

Regards,
Carrie Anderson

**PublicService Commission** <psc@utah.gov>

docket #16-035-T14

1 message

K Stockstill <kittendorf80@gmail.com>

Mon, Dec 5, 2016 at 9:18 PM

To: psc@utah.gov

People who invest in rooftop solar power shouldn't be penalized so Rocky Mountain Power can increase their profits. With how polluted our state's air quality is, we should be encouraging solar, and helping to reduce our dependence on fossil fuels.

Thank you for your consideration.
Katrina Stockstill

**PublicService Commission <psc@utah.gov>**

Advice No. 16-13

1 message

siegel777@gmail.com <siegel777@gmail.com>

Mon, Dec 5, 2016 at 10:49 PM

To: psc@utah.gov

To Whom It May Concern

I am writing this in regards to PacificCorp RMP's "Advice No. 16-13" filed November 9, 2016 that would change the rate structure for rooftop solar customers.

In particular I urge you to suspend the tariff and not let it take effect December 9 as Rocky Mountain Power has proposed and ask that they continue using the normal rate making process for its proposed change.

This change in the rate structure could severely hurt the solar industry and prevent people from investing in something that can be both cost beneficial and environmentally friendly. I find it ridiculous that people should be charged more for trying to take care of our environment, while at the same time taking some of the burden off of the electrical grid.

Thank you for your time,

Adam Siegel

Sent from my Adam Siegel's iPhone

**PublicService Commission** <psc@utah.gov>

Comment on #16-0350-T14

1 message

Preston Nielson <prnielson@gmail.com>

Tue, Dec 6, 2016 at 8:58 AM

To: psc@utah.gov

Re: Rocky Mountain Power (RMP) increasing solar rates

In a city where the air quality is so poor that it dissuades people and companies from moving here - and forces some to move away - we must do everything we can to encourage and incentivize the use of renewable energy. RMP's push to disincentivize the use of solar power is wrongheaded, selfish, and a clear example of a private company prioritizing profit and market share over public health and the environment.

Thank you for your consideration,
Preston



PublicService Commission <psc@utah.gov>

Docket #16-035 T14 Public Comment

1 message

Vreni Romang <romangvreni@gmail.com>

Tue, Dec 6, 2016 at 10:50 AM

To: psc@utah.gov

Dear Commissioners,

I oppose the recent proposal from Rocky Mountain Power, "Advice No.16-13", filed Nov. 9, 2016, that would change the rate structure for rooftop solar customers. I urge the Public service Commission to suspend the tariff and prevent it from taking effect on December 9 as Rocky Mountain Power has proposed. Rocky Mountain Power should be required to use the normal rate-making process.

I believe it is unfair for Rocky Mountain Power to raise rates fro customers who wish to use rooftop solar. I am deeply concerned about the future of our planet, and I believe solar gives people access to a cleaner more reliable source of energy. Utah's air quality needs to improve, and I believe rooftop solar should be part of that solution.

I also believe that we, the residents of Utah, should be able to have different energy options; the fact that Rocky Mountain is the main energy provider for the state creates a monopoly. When you give different solar companies the opportunity to grow in the state, you give consumers better opportunities to choose how they affect the environment.

Thank you for accepting public input on this important issue. I respectfully request that you put the interst of ratepayers and the Utah public on equal footing with Rocky Mountain Power, and reject Advice No. 16-13.

Sincerely,

Vreni Romang, romangvreni@gmail.com, Salt Lake City, UT



PublicService Commission <psc@utah.gov>

docket #16-035-T14.

1 message

Audrey L Thrasher <thrsadry@gmail.com>
To: psc@utah.gov

Tue, Dec 6, 2016 at 12:04 PM

Hello,

I am writing in regards to Docket 16-035-T14. I believe supporting solar helps encourage job growth and expansion of the state's GDP. Furthermore, supporting homes to expand solar reduces consumption of fossil fuels which aids in improving our air quality, which is some of the poorest in the nation.

The proposal to increase rates for solar use on individual homes would be disastrous to the solar industry in Utah. Other states that have introduced similar (although not as stringent) have had a disastrous impact on their solar industries. The introduction of these changes would lead to barriers to entry for new users and impact expansion for existing users.

Furthermore, the concept of Solar users not paying their fair share is absorbed in that concept as that is what kwh rates should be designed for. The higher the rate the more you are contributing to the grid. The fact that the power company takes power and charges it back to non-solar users at higher rates means they are already making a profit off of solar users in addition to the rates solar users pay for their KWH usage.

Why does charging more make sense? At this point, the change in charges appears to be driven by greed and \$\$ and wanting to increase the bottom line for big business. In Utah, we have prided ourselves on supporting business and users, while allowing people to be fiduciary responsible. Allowing for this rate hike appears to go against all of these tenants by supporting 1 company at the sake of multiple business and introducing barriers for people to who want opportunities to be more financially solvent.

I hope that you strongly consider the down-stream impact of these changes and what it would mean in 5, 10, 20 years not only for the shape of Uthanian's of today but of tomorrow.

Sincerely,
Audrey Thrasher



PublicService Commission <psc@utah.gov>

Docket #16-035 T14 Public Comment1 message

Garrett Wheeler <oremetua.uira@gmail.com>

Tue, Dec 6, 2016 at 2:08 PM

To: psc@utah.gov

Dear Commissioners,

I oppose the recent proposal from Rocky Mountain Power, "Advice No. 16-13", filed Nov. 9, 2016, that would change the rate structure for rooftop solar customers. I urge the Public Service Commission to suspend the tariff and prevent it from taking effect on December 9 as Rocky Mountain Power has proposed. Rocky Mountain Power should be required to use the normal rate-making process.

I believe it is unfair for Rocky Mountain Power to raise rates for customers who wish to use rooftop solar. I am deeply concerned about the future of our planet, and I believe solar gives people access to a cleaner, more reliable source of energy. Utah's air quality needs to improve, and I believe rooftop solar should be part of that solution.

Thank you for accepting public input on this important issue. I respectfully request that you put the interest of ratepayers and the Utah public on equal footing with Rocky Mountain Power, and reject Advice No. 16-13.

Sincerely,

Garrett Wheeler

oremetua.uira@gmail.com

Smithfield, UT



PublicService Commission <psc@utah.gov>

Re: Public comment on RMP increase for solar users1 message

James Brown <james@hmpg.net>

Tue, Dec 6, 2016 at 2:31 PM

To: PublicService Commission <psc@utah.gov>

After further discussion with Rocky Mountain Power, I'd like to add the following to my previous comments.

RMP does, indeed, propose to charge over \$9 (nine DOLLARS) per kWh for peak consumption. I assumed this was simply a typo in their article since it represents a 24,647% (yes, over 24000 percent!) increase for peak usage rates vs. the regular rate. However, after conversations back and forth via email, I've determined that it is not a typo and they plan to charge punitive rates to rooftop solar producers.

Under the proposed rate structure, a consumer could easily amass a bill larger than their pre-solar-install rate even though they are producing at least as much power as they are consuming, on average. Therefore, RMP is both getting paid for the power the solar producer is consuming, PLUS, getting to keep all the excess power they produce.

For example, a rooftop solar owner could easily have a single cloudy day, or a panel failure or other technical difficulty that causes them to not produce power for a few minutes, hours or even a day or two. Under such circumstances, they would be liable for their highest peak usage during that time even though they are producing more power than they are consuming in general.

Let's look at a concrete example. If a rooftop solar customer produces an excess of power each month (so they more than offset their entire consumption) but they use a heat pump heating system that consumes 10 kW of power per hour they would have a minimum bill of \$105 per month (10 kWh peak consumption x \$9.02 = \$90.20 + \$15 connect fee = \$105.20). The net effect is that they consumed 0 power but paid over \$100 for the privilege of having heat at 7pm on a cold winter night.

Add to this the fact that RMP does not currently provide residential customers with peak demand usage statistics. Without this information, a consumer has no way to anticipate what their bill will be if they convert to solar.

Such circumstance will effectively kill the rooftop solar industry in Utah. One has but to look at neighboring states (i.e. Nevada) who have implemented similar punitive rate structures to see how this has impacted renewable energy initiatives in those states.

I again urge the PSC to deny RMPs rate request in total. There is simply no justification for allowing RMP to set punitive rates designed specifically to discourage rooftop solar installations.

Thanks,

- James

On Sat, Dec 3, 2016, at 02:05 PM, James Brown wrote:

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

Email had 1 attachment:

- RMP PSC comment.pdf
176k (application/pdf)



PublicService Commission <psc@utah.gov>

Docket #16-035 T14 Public Comment

1 message

Elise Butterfield <elise.butterfield@gmail.com>

Tue, Dec 6, 2016 at 2:48 PM

To: psc@utah.gov

Dear Commissioners,

I oppose the recent proposal from Rocky Mountain Power, "Advice No. 16-13", filed Nov. 9, 2016, that would change the rate structure for rooftop solar customers. I urge the Public Service Commission to suspend the tariff and prevent it from taking effect on December 9 as Rocky Mountain Power has proposed. Rocky Mountain Power should be required to use the normal rate-making process.

I believe it is unfair for Rocky Mountain Power to raise rates for customers who wish to use rooftop solar. I am deeply concerned about the future of our planet, and I believe solar gives people access to a cleaner, more reliable source of energy. Utah's air quality needs to improve, and I believe rooftop solar should be part of that solution.

Thank you for accepting public input on this important issue. I respectfully request that you put the interest of ratepayers and the Utah public on equal footing with Rocky Mountain Power, and reject Advice No. 16-13.

Sincerely,

Elise Butterfield

elise.butterfield@gmail.com