



PublicService Commission <psc@utah.gov>

Comment on Docket No. 17-035-61

1 message

Faith Robbins <faith.robbsins@patagonia.com>
Reply-To: Faith Robbins <faith.robbsins@patagonia.com>
To: Public Service Commissioners <psc@utah.gov>

Tue, Sep 1, 2020 at 11:16 AM

Dear Commissioners,

As a Utah resident, I am writing to ask you to reject Rocky Mountain Power's proposed solar export credit rate (Docket No. 17-035-61).

This utility's proposed export credit rate reduction from 9.4¢/kWh to ~ 1.5¢/kWh is nothing more than an attempt by Rocky Mountain Power to misrepresent the value of rooftop solar in order to stifle competition and monopolize renewable power generation. The evidence provided throughout this solar export proceeding has both demonstrated the value of customer-generated exports and shown that Rocky Mountain Power has failed to adequately assess the value of excess solar energy in its proposed rate change.

A better solution than the proposed rate, which, if approved, would be among the most punitive in the nation, is an increased solar export credit rate. The Vote Solar Load Research Study demonstrates the value of customer-generated exports at 10.57¢/kWh from utility-based benefits alone. This valuation does not include the avoided environmental and social costs associated with Rocky Mountain Power's coal-heavy generation portfolio. Even without those benefits, the study has demonstrated that distributed solar benefits outweigh the costs.

While it is important to recognize that rooftop solar customers are still very much on the grid, utilizing utility infrastructure, one cannot fairly calculate the cost of this over the many benefits to the grid, customers, and community provided by rooftop solar.

Rooftop solar creates many system-wide benefits enjoyed by all Rocky Mountain Power service area customers and the utility itself. Distributed energy generation from rooftop solar contributes to grid flexibility and resilience and avoids costly transmission upgrades. Additionally, rooftop solar helps create consumer choice and keeps customer dollars local. A punitive export credit rate would take all of these benefits away and would further exclude low-income communities from consumer choice. Rapid implementation of the utility's proposed export credit rate would create a shock for rooftop solar customers and the solar industry. Reducing the export credit by 84% would also jeopardize thousands of local jobs and create additional cost risks for customers through fuel price volatility and major infrastructure development.

Rooftop solar helps to ensure safe, reliable, adequate, and reasonably priced utility service, the guidance by which the Commission is to assess rate proposals. Evidence brought forth throughout this proceeding and by dozens of cases throughout the country confirm that a reduced solar export credit is the inappropriate regulatory response to rooftop solar and will serve to disincentivize the integration of renewable energy into Utah's energy portfolio.

Sincerely,
Faith Robbins
[323 S 1000 E](#)
[Salt Lake City, UT 84102](#)