



PublicService Commission <psc@utah.gov>

Comment on Docket No. 17-035-61

1 message

Kirsty Johnson <kirstygems@gmail.com>
Reply-To: Kirsty Johnson <kirstygems@gmail.com>
To: Public Service Commissioners <psc@utah.gov>

Sat, Sep 5, 2020 at 8:42 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 22¢ per kilowatt-hour. This value includes 10.57¢/kWh from utility-based benefits alone. Environmental and social benefits add an additional 12/03¢ of benefits.

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. Please consider increasing the export credit rate to reflect the real benefits created by rooftop solar.

Sincerely,
Kirsty Johnson
[2566 Quincy Ave](#)
[Ogden, UT 84401](#)



PublicService Commission <psc@utah.gov>

Comment on Docket No. 17-035-61

1 message

C Buckingham <cbuckingham.ut@gmail.com>
Reply-To: C Buckingham <cbuckingham.ut@gmail.com>
To: Public Service Commissioners <psc@utah.gov>

Sun, Sep 6, 2020 at 9:45 PM

Dear Commissioners,

We agree with this form letter. In 2019 we made a huge investment to add solar power to our roof; the system was finally installed this summer. We did it to contribute to the community, to reduce our carbon footprint, and to help improve SLC's air, but believe that the investment should be recognized financially.

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 22¢ per kilowatt-hour. This value includes 10.57¢/kWh from utility-based benefits alone. Environmental and social benefits add an additional 12/03¢ of benefits.

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 confirms 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. Please consider increasing the export credit rate to reflect the real benefits created by rooftop solar

Sincerely,
C Buckingham
655 N H St
Salt Lake City, UT 84103



PublicService Commission <psc@utah.gov>

Comment on Docket No. 17-035-61

1 message

David Haralson <d.m.haralson@ieee.org>
To: psc@utah.gov

Mon, Sep 7, 2020 at 3:00 PM

To the Public Service Commission of Utah,

My name is David Haralson. I have worked as an electrical engineer in the electric utility industry for several years and hold a Master of Science degree from the University of Utah in Electrical and Computer Engineering with emphasis in power systems. I am a ratepayer within Rocky Mountain Power's service territory. This statement is made in a personal capacity and does not necessarily reflect the views of my employer.

I recommend that the Commission adopt the recommendations provided by Brianna Kobor in her testimony on behalf of Vote Solar dated March 3, 2020 and submitted March 6, 2020. The results of Vote Solar's load research study are compelling and convincing that the "benefits of the net metering program will exceed the costs" (Utah Code Ann. § 54-15-105.1.). While Rocky Mountain Power (RMP) limits its analysis of costs and benefits to those directly impacting itself, the Commission is not obligated to limit its analysis in such a way or to exclude benefits accruing to the community. Rather, its mandate from the legislature is broad in scope and should include all associated costs and benefits.

One of James Bonbright's classical principles of public utility rate-making—as A. Faruqui and C. Bourbonnais recently paraphrased it—is that rates should be a "reflection of all the present and future private and social costs and benefits occasioned by a service's provision (i.e., all internalities and externalities)" ("The Tariffs of Tomorrow," IEEE Power & Energy Magazine, Vol. 18 No. 3, May/June 2020). By this principle, excluding community benefits (health, economic, and otherwise) as RMP has done in its analysis would lead to unjust and/or unreasonable rates. Including community benefits as Vote Solar did is in accordance with responsible principles of rate-making. To exclude them as RMP proposes would be irresponsible rate-making.

RMP argues in its rebuttal testimony dated July 2020 that including community benefits amounts to a subsidy and that Vote Solar's recommended export credit rates would be "set at a level that is above their actual value," adding that "True competitive benefits occur when an industry can operate without subsidies." RMP is right that subsidies reshape competition but is wrong to characterize fair compensation for created value as a subsidy. The issue is, in fact, that if community and other benefits are not properly valued—or as RMP proposes for some, not valued at all—this amounts to a subsidy and market distortion in RMP's favor by underpricing the product they buy from the ratepayers.

In the closing statement of that same testimony, RMP directly states that it wants to "insulat[e] other customers from the effects of" customers with onsite generation such as solar panels. With this, RMP lays bare its goal; to keep the clear benefits of clean, renewable, customer-owned, distributed generation at bay. Its customers in the Salt Lake Valley must deal with air pollution from its Gadsby plant. Its customers in Emery County must deal with pollution and waste from its Huntington and Hunter plants. Yet, RMP wants to shield its customers from rooftop solar panels which reduce the need for these polluting plants to run.

Again, I recommend that the Commission adopt the recommendations provided by Vote Solar.

David Haralson
Rocky Mountain Power Ratepayer
M.S. Electrical and Computer Engineering, University of Utah
Resident of Midvale, Utah
d.m.haralson@ieee.org



PublicService Commission <psc@utah.gov>

Docket No. 17-035-61 Public Comment

1 message

James Harris (jharris@stanford.edu) Sent You a Personal Message <automail@knowwho.com>
To: psc@utah.gov

Mon, Sep 7, 2020 at 11:43 PM

Dear Utah Public Service Commission,

While a California resident, I own a ski condo at Snowbird and when i look down the canyon to Salt Lake City, the air quality is often horrible. Utah has an abundant solar resource and should develop clean solar energy combined with storage to provide the power needs of the state.

As a resident of Utah, I am urging you to reject Rocky Mountain Power's proposal to reduce the export credit rate of rooftop solar by up to 85%. The change in value for residential customers from 9.2¢/kWh to 1.5¢/kWh is not supported by sound science, as demonstrated by the vastly different valuations between the Rocky Mountain Power and Vote Solar studies. The rate change would result in drastic job losses for an entire industry, compounding the hardship of the current economic crisis in this state. Additionally, by allowing this change, the Public Service Commission would be condoning Rocky Mountain Power's monopolization of sun power, and cutting off Utahns' right to energy choice.

Our energy grid is rapidly evolving. The future of the grid must include a diversity of resources, including distributed generation which supports greater community resiliency. If the Public Service Commission allows Rocky Mountain Power to undervalue the contributions of rooftop solar, then it is essentially stifling millions of dollars of potential crowd-funded investment in our grid infrastructure. A decision to approve a 1.5¢/kWh rate is a decision to support corporate welfare over the future stability and sustainability of our energy grid.

I implore you to serve the best interest of the people of Utah over the shareholders of Rocky Mountain Power. Reinstate net-metering and afford the people of Utah our right to choose the clean, distributed energy choice we deserve.

Sincerely,

James Harris
330 Jane Stanford Way
James, UT 94305
jharris@stanford.edu
(650) 723-9775

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.



PublicService Commission <psc@utah.gov>

Docket No. 17-035-61 Public Comment

1 message

Susan Jamieson (suejroadrunner@gmail.com) Sent You a Personal Message <automail@knowwho.com>
To: psc@utah.gov

Tue, Sep 8, 2020 at 9:12 AM

Dear Utah Public Service Commission,

As a resident of Utah, I am urging you to reject Rocky Mountain Power's proposal to reduce the export credit rate of rooftop solar by up to 85%. The change in value for residential customers from 9.2¢/kWh to 1.5¢/kWh is not supported by sound science, as demonstrated by the vastly different valuations between the Rocky Mountain Power and Vote Solar studies. The rate change would result in drastic job losses for an entire industry, compounding the hardship of the current economic crisis in this state. Additionally, by allowing this change, the Public Service Commission would be condoning Rocky Mountain Power's monopolization of sun power, and cutting off Utahns' right to energy choice.

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I implore you to serve the best interest of the people of Utah over the shareholders of Rocky Mountain Power. Reinstate net-metering and afford the people of Utah our right to choose the clean, distributed energy choice we deserve.

Sincerely,

Susan Jamieson
1924 Roadrunner HI
Moab, UT 84532
suejroadrunner@gmail.com
(435) 259-8372

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.



PublicService Commission <psc@utah.gov>

Docket No. 17-035-61 Public Comment

1 message

Bella Smith (bell5133@gmail.com) Sent You a Personal Message <automail@knowwho.com>

Tue, Sep 8, 2020 at 10:55 AM

To: psc@utah.gov

Dear Utah Public Service Commission,

As a resident of Utah, I am urging you to reject Rocky Mountain Power's proposal to reduce the export credit rate of rooftop solar by up to 85%. The change in value for residential customers from 9.2¢/kWh to 1.5¢/kWh is not supported by sound science, as demonstrated by the vastly different valuations between the Rocky Mountain Power and Vote Solar studies. The rate change would result in drastic job losses for an entire industry, compounding the hardship of the current economic crisis in this state. Additionally, by allowing this change, the Public Service Commission would be condoning Rocky Mountain Power's monopolization of sun power, and cutting off Utahns' right to energy choice.

Our energy grid is rapidly evolving. The future of the grid must include a diversity of resources, including distributed generation which supports greater community resiliency. If the Public Service Commission allows Rocky Mountain Power to undervalue the contributions of rooftop solar, then it is essentially stifling millions of dollars of potential crowd-funded investment in our grid infrastructure. A decision to approve a 1.5¢/kWh rate is a decision to support corporate welfare over the future stability and sustainability of our energy grid.

I implore you to serve the best interest of the people of Utah over the shareholders of Rocky Mountain Power. Reinstate net-metering and afford the people of Utah our right to choose the clean, distributed energy choice we deserve.

Sincerely,

Bella Smith
2482 e 3910 s
St george, UT 84790
bell5133@gmail.com
(435) 747-1602

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.



PublicService Commission <psc@utah.gov>

Docket No. 17-035-61 Public Comment

1 message

kenneth cross (buckcross@sbcglobal.net) Sent You a Personal Message <automail@knowwho.com>

Tue, Sep 8, 2020 at 1:03 PM

To: psc@utah.gov

Dear Utah Public Service Commission,

trump is a thug and moron. lock him up.

As a resident of Utah, I am urging you to reject Rocky Mountain Power's proposal to reduce the export credit rate of rooftop solar by up to 85%. The change in value for residential customers from 9.2¢/kWh to 1.5¢/kWh is not supported by sound science, as demonstrated by the vastly different valuations between the Rocky Mountain Power and Vote Solar studies. The rate change would result in drastic job losses for an entire industry, compounding the hardship of the current economic crisis in this state. Additionally, by allowing this change, the Public Service Commission would be condoning Rocky Mountain Power's monopolization of sun power, and cutting off Utahns' right to energy choice.

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I implore you to serve the best interest of the people of Utah over the shareholders of Rocky Mountain Power. Reinstate net-metering and afford the people of Utah our right to choose the clean, distributed energy choice we deserve.

Sincerely,

kenneth cross
180 N 1100 E unit 42
washington, UT 84780
buckcross@sbcglobal.net
(713) 408-0908

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.



PublicService Commission <psc@utah.gov>

Docket No. 17-035-61 Public Comment

1 message

Richard Paul (richardlynnpaul@hotmail.com) Sent You a Personal Message <automail@knowwho.com>

Tue, Sep 8, 2020 at 2:29 PM

To: psc@utah.gov

Dear Utah Public Service Commission,

Luckily, I'm not under Rocky Mountain Power. They are being greedy. We need to incentivize Solar Panels by leaving the credit rate alone.

As a resident of Utah, I am urging you to reject Rocky Mountain Power's proposal to reduce the export credit rate of rooftop solar by up to 85%. The change in value for residential customers from 9.2¢/kWh to 1.5¢/kWh is not supported by sound science, as demonstrated by the vastly different valuations between the Rocky Mountain Power and Vote Solar studies. The rate change would result in drastic job losses for an entire industry, compounding the hardship of the current economic crisis in this state. Additionally, by allowing this change, the Public Service Commission would be condoning Rocky Mountain Power's monopolization of sun power, and cutting off Utahns' right to energy choice.

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I implore you to serve the best interest of the people of Utah over the shareholders of Rocky Mountain Power. Reinstate net-metering and afford the people of Utah our right to choose the clean, distributed energy choice we deserve.

Sincerely,

Richard Paul
2875 W 560 S
Lehi, UT 84043
richardlynnpaul@hotmail.com
(801) 722-8480

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.



PublicService Commission <psc@utah.gov>

Comment on Docket No. 17-035-61

1 message

Tyler Lawson <tylerlawson0809@gmail.com>
To: psc@utah.gov

Tue, Sep 8, 2020 at 2:31 PM

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.

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Best,
Tyler Lawson
[382 S 375 E](#)
[Pleasant Grove, UT 84062](#)

