

To the Public Service Commission of Utah,

Thank you for giving me the opportunity to address the commission regarding the issue of net metering for rooftop solar. I am not writing this letter in my role as a pediatrician to discuss the detrimental effects of poor air quality on the health of our children. I believe that the structuring of a net metering agreement for solar customers is fundamentally an economic issue. I also believe that we make good choices when our economic incentives align with what is best for us. Rooftop solar is one of those few instances where what is best for Utahans does in fact align with our economic incentives. However, these economic incentives rely on a fair net metering agreement which is in stark contrast to what is being proposed by Rocky Mountain Power.

As a homeowner, rooftop solar is one of the most sound investments I have been able to make in my households economic future. Given the low cost of solar energy, rooftop solar installation is a rare sure fire way for homeowners to invest in our financial well-being. Moreover, as a taxpayer, it should be our priority to bring federal tax dollars that we pay every year back into the Utah economy. The net metering agreement suggested by Rocky Mountain Power would effectively kill rooftop solar by making it economically unviable for ordinary Utahans. This would cause the loss of thousands of high paying jobs, prevent homeowners from investing in their financial future, and cause a loss of federal tax incentives that would otherwise be going back into the Utah economy.

As you consider how to structure the net metering agreement for rooftop solar, I ask that you consider the positive economic impact that rooftop solar has on Utah's economy. Utah has abundant sunshine and is ideal for rooftop solar. Rooftop solar installation creates thousands of jobs. Rooftop solar installation brings federal taxpayer dollars back to ordinary Utahans. Rooftop solar allows homeowners to make a sound investment in their financial wellbeing. I ask that you consider what is best for Utah's economy rather than what is best for Warren Buffet and the shareholders of Berkshire Hathaway (Rocky Mountain Power's Parent Company).

Best regards,

Zachary Drapkin MD

Bill Hanewinkel  
1332 Dover Road  
Salt Lake City, UT 84108  
October 2, 2020

Utah Public Service Commission  
160 E 300 S #4  
Salt Lake City, UT 84111

| Subject: Docket No. 17-035-61

Dear Public Service Commissioners,

I strongly urge you to reinstate net metering and a fair tariff for rooftop solar-generated electricity. The tariff study produced by Vote Solar demonstrates the value of rooftop solar to Rocky Mountain Power (RMP), its customers, and the citizens of Utah. Please adopt the Vote Solar Report recommendations.

In 2009, our family really started paying attention to climate change and the health impacts of reliance on fossil fuels. As an overall goal of lowering our carbon footprint, we took advantage of Net Metering rules and built our first rooftop photovoltaic system. This was followed in 2011 with another module. At the time, the first collectors were \$650 per panel. The two systems have been extraordinarily reliable and quiet. They produce electricity without emitting carbon dioxide or other polluting substances. In conjunction with the rooftop solar, we changed our water heater from gas to electric, which eliminated NOX emissions from that source. Compared to traditional coal, gas, and nuclear plants, rooftop solar creates a smaller carbon footprint, requires less water, and creates less waste heat. In all of the years the solar generator has been on our roof, I have only had pleasant exchanges with people curious about what was on our roof, how it works, and then expressing that they thought it was fantastic.

I am concerned that in all of the years the solar generator has been on our roof, only Rocky Mountain Power has questioned our integrity and accused us of cheating other rate payers. We understand that wealthy individuals such as the Koch brothers and monopoly utilities would prefer to keep all the control and profits from electricity generation because they have invested heavily in fossil fuels (<https://www.politico.com/story/2015/08/warren-buffett-green-energy-empire-anger-liberal-213125>). However, when utility companies develop their estimates of costs, they do not take into account the fact that more rooftop systems would delay or prevent capital expenditures for large energy projects. They also neglect the enormous health costs incurred by reliance on fossil fuel generated electricity systems. Recent cost estimates place the estimated cost to health from coal-fired electricity at \$0.19 to 0.45 cents per kWh (Machol & Rizk, 2013).

While I applaud RMP's plans for utility-sized solar and wind electric generation, these are centralized generators with distribution losses. In addition, rooftop solar can supplement utility scale systems, given that Rocky Mountain Power only receives 4.45% of its fuel mix from solar energy (<https://www.rockymountainpower.net/savings-energy-choices/blue-sky-renewable-energy/product->

[content-label.html](#) ). Home rooftop solar systems are also not subject to controversies of utility scale development, such as displacement of desert tortoises or burrowing owls. Climate change is accelerating and faster efforts by individuals and companies can help avoid future destructive consequences if we quickly substitute renewable energy for carbon polluting sources. I believe that involving as many citizens as possible toward these efforts is good for all of us. Rooftop solar builds in resiliency to the power grid and also engages citizens to counter threats to our climate system.

As we discuss rooftop solar, we should be considering the growth of the electric car market. Governor Herbert has encouraged the development of electric car charging infrastructure. However, electric utilities around the U.S. are already studying how this additional consumption affects their power network (<https://sepapower.org/resource/preparing-for-an-electric-vehicle-future-how-utilities-can-succeed/>). Current production electric cars consume 25-30 kWh per 100 miles. For example, given the limited miles I travel, our household's use of electric vehicles would consume another 100 kWh per month. But most people drive much more than 400 miles in a month. Logic demands that we assess the effects of increased electricity demand on neighborhood and substation capacity (<https://www.fleetcarma.com/ev-clustered-charging-can-problematic-electrical-utilities>). Rooftop solar can help fill the gap of that future localized demand along with the added advantage that the car battery could supply power back to the grid during peak hours from 6-9PM. Utah would miss out on this innovative plan for renewable energy if RMP's current request is granted.

It is shocking to realize that RMP wants to reduce what it pays residents for generating electricity, from 0.092 cents/kWh to 0.015 cents/kWh, a whopping 84% reduction. Electric utilities in other regions of the U.S. have reached fair settlements with rooftop solar proponents to create economically healthy energy plans. For example, South Carolina and Oregon credit electricity-generating customers with the same value as they charge consuming customers (<http://solar.sc.gov/netmetering> ; <https://www.energytrust.org/solar-net-metering>). These utility and rooftop solar agreements not only help build power network resiliency but help these regions grow their economies. This doesn't need to be a case of winners and losers. Our region's energy needs cannot be that much different than other areas of the country. We Utahns expect and can do better. Please reinstate Net Metering.

Sincerely,

Bill Hanewinkel

Machol, B., & Rizk, S. (2013). Economic value of U.S. fossil fuel electricity health impacts. *Environment International*, 52, 75-80. doi:10.1016/j.envint.2012.03.003



PublicService Commission &lt;psc@utah.gov&gt;

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**Public Comments for RMP Export Credits Phase II, 17-035-61 - as presented**

1 message

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**Miranda Menzies** <menzies.miranda@gmail.com>  
To: psc@utah.gov

Mon, Oct 5, 2020 at 4:35 PM

Please see attached images showing Ground Source Heat Loop system, which is financially possible because of net-metering. thank you, Miranda Menzies

My husband and I decided to move to Utah in 2009, with the goal of building an energy efficient house, with a minimal carbon footprint. We knew that rooftop solar would be the best way to generate our own energy, and supply net power to our home, for heating and cooling as well as lighting etc.

We insisted that every extra feature we included made financial sense. Because of net-metering, return on solar investment at that time was about 12 years. Batteries didn't make financial sense.

We have now lived in that house for 10 years and the paybacks are now comfortably In the Black.

In summary, the house is well insulated and airtight, and we have a Ground Source Heat Loop HVAC and hot-water system for which payback to profit was 2 years. For every KWhr of electricity used for our heat pump, we gather in 5 KWhr of heating effect – from last year's solar warmth stored in the ground under a grassy patch of our yard. {Show Photo}

Because of net metering we pay \$8.50 per month. Our natural gas bills are about \$12 per month. So our annual total energy bills are around \$270. This has been a huge benefit to us in our retirement on fixed income.

We need to make this low power cost a part of the future for many Americans. Yes, we will need to accurately reflect the true monthly cost of distribution of electric power, and the storage systems that the power companies will need to install. But that will need to be a separate filing.

The net reduction in capital investment for future electric generation is a huge value to RMP.

When our solar contractor visits to maintain the system, we are reminded of the well-paid, good jobs that solar brings to our community. This is one reason why 24 Utah communities, including Ogden have committed to 100% renewable by 2030.

Please support distributed solar to help Utah grow into the future. Please consider all of the health benefits, and the local jobs that it brings.

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 **Menzies slides for PSC.pdf**  
2238K

Blueboard ESP with 2x4 siding furring strips





Ground loop  
prior to backfill



ERV

Humidifier (energy hog)

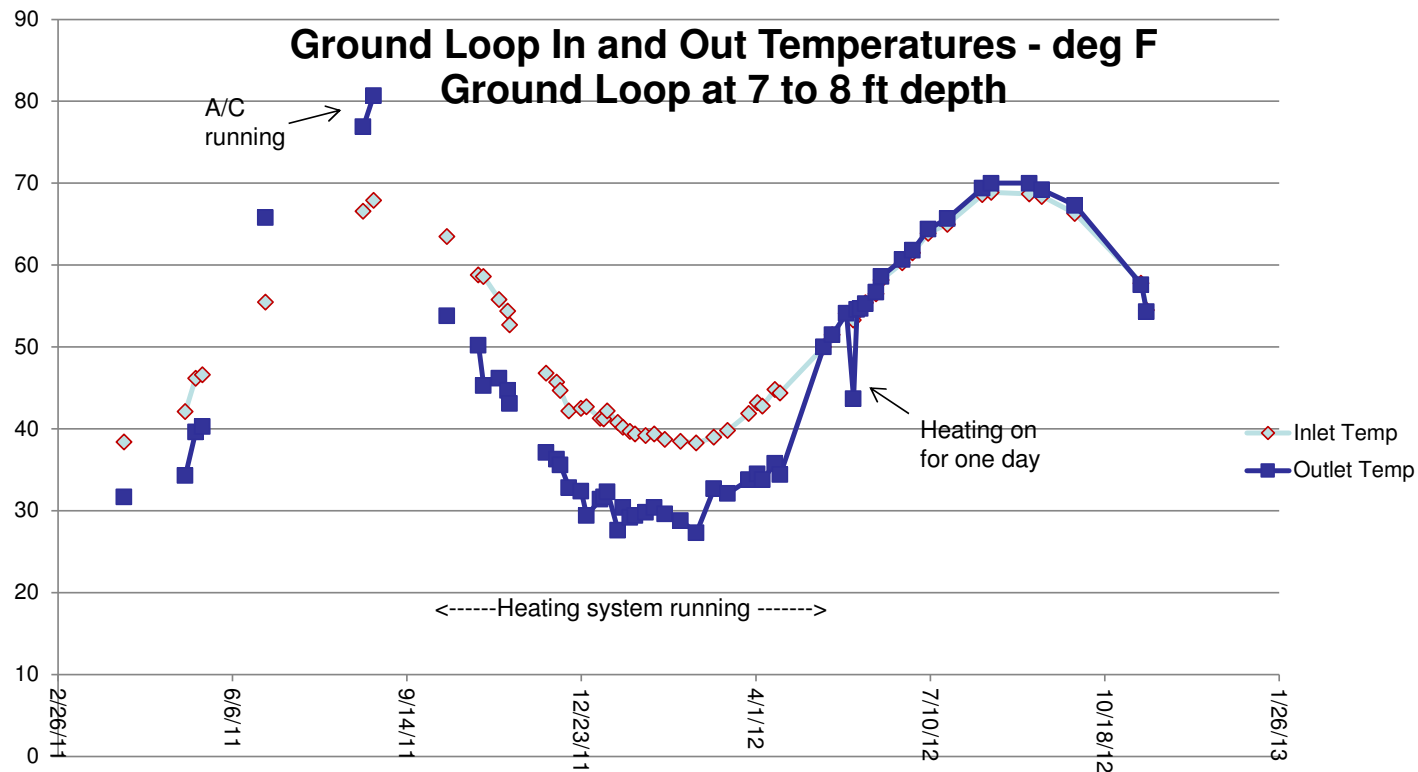
Hot water  
tanks

GSHP

Ground source heat loop  
inlet and outlet lines

Photo Chris Munson

# Ground Loop Temperatures





PublicService Commission &lt;psc@utah.gov&gt;

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**Comment on Docket No. 17-035-61**

1 message

**Alex Rowe** <alex.rowe@slcschools.org>

Fri, Oct 2, 2020 at 5:30 PM

Reply-To: Alex Rowe &lt;alex.rowe@slcschools.org&gt;

To: Public Service Commissioners &lt;psc@utah.gov&gt;

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,  
Alex Rowe  
[1919 E. Evergreen Ave.](#)  
[Salt Lake City, UT 84106](#)



PublicService Commission &lt;psc@utah.gov&gt;

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**DocketNo. 17-035-61**

1 message

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**Gary Hedlund** <gary.hedlund@icloud.com>  
To: psc@utah.gov

Fri, Oct 2, 2020 at 7:57 PM

Public Service Commission members,

I am writing, to oppose Rocky Mountain Power (RMP) seeking an 84% reduction in export credit for residential rooftop solar production in Utah. This request by RMP fails to acknowledge the benefits that distributive or lateralized rooftop solar power production is currently bringing to the RMP grid, ignores the impact of rooftop solar upon the RMP's fuel costs, and fails to fully recognize the negative impact this proposal would have upon Utah's solar related businesses currently and upon the substantial growth potential of the rooftop solar sector in Utah.

The 12 cents per kWh credit (Locked in for 20years) that Utah Clean Energy and their allies are asking for is a request that I strongly support. Enacting such a favorable export credit represents a key to continued expansion of emission free renewable energy, boosting homeowners incentive to invest in rooftop solar and contribute to clean air initiatives along the Wasatch front.

[Dr. Gary Hedlund, 801 4141415, [gary.hedlund@icloud.com](mailto:gary.hedlund@icloud.com)

Sent from my iPad



PublicService Commission &lt;psc@utah.gov&gt;

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**Docket No. 17-035-61 Public Comment**

1 message

**Crystal Lewter (sunflower4898@yahoo.com) Sent You a Personal Message**

Fri, Oct 2, 2020 at 8:05 PM

&lt;automail@knowwho.com&gt;

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,

Crystal Lewter  
4600 s 2850 w  
West valley city, UT 84119  
[sunflower4898@yahoo.com](mailto:sunflower4898@yahoo.com)  
(657) 333-5528

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](mailto:core.help@sierraclub.org) or (415) 977-5500.



PublicService Commission &lt;psc@utah.gov&gt;

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**Docket No. 17-035-61 Public Comment**

1 message

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**Jacob Hyden (jacobdhyden@gmail.com) Sent You a Personal Message**

Fri, Oct 2, 2020 at 9:01 PM

&lt;automail@knowwho.com&gt;

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.

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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,

Jacob Hyden  
1298 N Commerce Dr Apt C303  
Saratoga Springs, UT 84045  
[jacobdhyden@gmail.com](mailto:jacobdhyden@gmail.com)  
(801) 318-5725

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](mailto:core.help@sierraclub.org) or (415) 977-5500.



PublicService Commission &lt;psc@utah.gov&gt;

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**Docket No. 17-035-61 Public Comment**

1 message

**Sydney Ahmadian (sydneyahmadian@gmail.com) Sent You a Personal Message**

Sat, Oct 3, 2020 at 7:15 AM

&lt;automail@knowwho.com&gt;

To: psc@utah.gov

Dear Utah Public Service Commission,

I work in the Utah solar industry and cannot believe this is even up for debate. When the Diesel engine took the place of Horse and Buggy, you didn't see Horse owners in the halls of Washington picketing and protesting. We all embraced the new best thing. Solar is better than oil, period. If the industry is to survive the onslaught of pushback of big oil we need people to get this concept. Oil jobs will become solar jobs. Oil customers will become solar customers. I work for a Solar Startup called Empire Solar, which began as an Oilfield maintenance company. Our owners saw, wisely, that the future of Oil is full of turmoil and their talent and work ethic could be put to use on behalf of the planet rather than toward polluting and destroying it. Anyone can make this shift, even the greasy lobbyists working for RMP. I can find another job if this passes, but Utah needs access to affordable and solar. So I'm going to stay and fight these well-paid buggy enthusiasts.

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,

Sydney Ahmadian  
1877 South 200 East  
Salt Lake City, UT 84115  
[sydneyahmadian@gmail.com](mailto:sydneyahmadian@gmail.com)  
(408) 313-9035

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](mailto:core.help@sierraclub.org) or (415) 977-5500.



PublicService Commission &lt;psc@utah.gov&gt;

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**Docket No. 17-035-61**

1 message

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**Jim Yehle** <jry@xmission.com>  
To: psc@utah.gov

Sat, Oct 3, 2020 at 8:12 AM

I strongly oppose Rocky Mountain Power's proposed cost valuation of electrical power supplied to their grid from customer home solar panels.

First off, I don't trust their numbers. RMP is a for-profit corporation, and their goal is to make money, even when it comes at the expense of supplying services to the community it purports to serve. Remember, we have granted RMP a monopoly. It is up to us, the citizens and their appointed regulators, to counter their self-serving stance with one that reflects what we want our community to be.

Why do I think RMP's numbers sound fishy? Well, if they claim that they can buy a kW-hour of power on the open market for a penny, then sell it to me for a dime, why don't they just do that, and not generate any power at all? Sounds like a great business plan. Secondly, if one percent of their power comes from home-solar buyback, go ahead and raise the rates by 1% and see how many customers even notice. RMP's third specious argument--that solar generates peak power when they don't need it. If that were a factor, why isn't there a shifting rate structure to encourage usage in off-peak hours? It would be super easy for me to schedule the charging of my electric car at night instead of when I arrive home at 6:00 in the summer.

It is precisely the purview of government to solve our community's pollution and climate problems. But this is Utah. Whenever the community and financial interests come into conflict, the business interests always win. So citizens are trying to help solve the problem where government and business are failing us. RMP grossly mischaracterizes the motivation of home solar owners as elitist opportunists trying to game the system at the expense of normal ratepayers. That's not it at all. They are rising where RMP won't, to help solve a community and global problem. It's an expense and a hassle. If RMP would build large solar and wind projects (and storage), and shut down their coal and natural-gas fired plants, citizens wouldn't need to take on the burden themselves.

I realize that the rate setting laws don't allow any non-monetary considerations to enter the discussion. (Who wrote this law? How do we change it?) But even lacking those inputs, I think that a neutral analysis would show that RMP's ridiculously low reimbursement rate proposal is absurdly low.

--

Jim Yehle  
[jry@xmission.com](mailto:jry@xmission.com)



**Docket No. 17-035-61 - Please do NOT allow the reduction in rooftop solar credits**

1 message

Sat, Oct 3, 2020 at 10:00 AM

To: [psc@utah.gov](mailto:psc@utah.gov)

I strongly oppose the request by Rocky Mountain Power (RPM) to reduce solar credits. If costs are higher for RPM to accept solar energy back into the grid, then they should become creative and more efficient in handling it and diversify to keep their business going. Not punish those who are doing what is better for the individual and the environment. I understand companies are in business to make a profit, but not to the detriment of the individual whom they serve.

Peace,  
Eileen

\* \* \* \* \*

Eileen Galoostian  
eileen@skihooligans.com



PublicService Commission <psc@utah.gov>

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## Docket No. 17-035-61

1 message

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**Robert Bigelow** <ngc84101@yahoo.com>  
To: "psc@utah.gov" <psc@utah.gov>

Sat, Oct 3, 2020 at 4:58 PM

To the Members of the Utah Public Service Commission,

Please reject Rocky Mountain Power's proposed rate change for customers with solar power.

It would be unjust to allow Rocky Mountain Power to pay solar producers 1.5 cents per kilowatt-hour for power which they then sell for at least 9.2 cents per kilowatt-hour.

Sincerely,

Robert Bigelow  
Stansbury Park, UT

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

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**Re: Docket No. 17-035-61**

1 message

**Shawn Fowers** <reddubba02@everyactioncustom.com>

Sat, Oct 3, 2020 at 9:07 PM

Reply-To: reddubba02@gmail.com

To: psc@utah.gov

Dear Utah Public Service Commission,

I want to make it clear that I think that solar is a valuable resource in Utah, and firmly believe that the proposed adjustment to net metering by Rocky Mountain Power will stifle the development of new solar. I would not have gotten panels for my current home, and will not be getting them for my new home that we're building if this adjustment happens.

Sincerely

Shawn Fowers

Sincerely,  
Shawn Fowers  
2326 Tyler Ave Ogden, UT 84401-1934  
[reddubba02@gmail.com](mailto:reddubba02@gmail.com)



PublicService Commission &lt;psc@utah.gov&gt;

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**"Docket No. 17-035-61"**

1 message

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**Chris Poulsen** <chris@pureenergy.biz>  
To: psc@utah.gov

Sat, Oct 3, 2020 at 9:59 PM

To Whom it May Concern,

My name is Christopher Poulsen and I just moved my family back here after growing our solar company in Southern California for the past seven years. We have helped hundreds of families with their choice to convert over to solar renewable energy. This has been the primary source of income for my family and has launched my career in the solar industry.

Utah is home for us and we are looking forward to helping more families here benefit by going solar. I am opposed to the proposal by Rocky Mountain Power: (RMP has asked the Public Service Commission for permission to devalue rooftop solar energy by a whopping 84%: from 9.2 cents per kilowatt hour to 1.5 cents.)

This would devastate residential rooftop solar in Utah and force me to travel outside the state for work and be away from my family. I would prefer to help families here in Utah and stay home.-- Please help save our jobs here locally to help our local communities and economy.

Best Regards,

**Chris Poulsen***Regional Energy Advisor***PUREENERGY**

(951) 547 - 2837 Cell/Direct

(888) 722 - 2285 Office



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PublicService Commission &lt;psc@utah.gov&gt;

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**Comment on Docket No. 17-035-61**

1 message

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**Christopher Poulsen** <cp.pureenergy@gmail.com>  
Reply-To: Christopher Poulsen <cp.pureenergy@gmail.com>  
To: Public Service Commissioners <psc@utah.gov>

Sat, Oct 3, 2020 at 10:04 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.

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,  
Christopher Poulsen  
[311 Seemore Dr](#)  
[Kaysville, UT 84037](#)



PublicService Commission &lt;psc@utah.gov&gt;

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**Comment on Docket No. 17-035-61**

1 message

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**Christopher Hill** <christopher.s.hill@icloud.com>  
Reply-To: Christopher Hill <christopher.s.hill@icloud.com>  
To: Public Service Commissioners <psc@utah.gov>

Sat, Oct 3, 2020 at 10:19 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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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,  
Christopher Hill  
[122 W Hackberry Road](#)  
[Vineyard, UT 84059](#)



PublicService Commission &lt;psc@utah.gov&gt;

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**Comment on Docket No. 17-035-61**

1 message

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**Dustin Millen** <millen\_2@icloud.com>  
Reply-To: Dustin Millen <millen\_2@icloud.com>  
To: Public Service Commissioners <psc@utah.gov>

Sat, Oct 3, 2020 at 10:25 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.

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.

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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,  
Dustin Millen  
[2066 E 1050 S](#)  
[Spanish Fork, UT 84660](#)



PublicService Commission <psc@utah.gov>

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## Docket No. 17-035-61

1 message

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**Benjamin Wade** <benwade21@gmail.com>  
To: psc@utah.gov

Sat, Oct 3, 2020 at 10:56 PM

I strongly support solar and renewables in Utah.  
Rocky Mountain Power isn't being objective in their analysis.

Ben Wade  
4411 S Wander Lane  
Holladay, UT 84124

Sent from my iPhone



PublicService Commission &lt;psc@utah.gov&gt;

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**Docket No. 17-035-61**

1 message

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**Tegan Gibelyou** <teganrg@yahoo.com>  
Reply-To: Tegan Gibelyou <teganrg@yahoo.com>  
To: "psc@utah.gov" <psc@utah.gov>

Sun, Oct 4, 2020 at 7:11 AM

I am opposed to Rocky Mountain Power's proposal to change the compensation of solar providers. It would be a move to create a monopoly and sabotage any further solar business. On top of these two, the harm that fossil fuels do to our air and especially within Utah and salt lake counties puts the citizens in greater risk as air pollution increases. Solar power is an effective and clean alternative. But this proposal will be a move to cut off any potential clients for solar. Please do not accept allow RMP to become such a monopoly.

Tegan Steimle



PublicService Commission &lt;psc@utah.gov&gt;

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**Docket NO. 17-035-61**

1 message

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**ANDY SCHOENBERG** <wfaut@comcast.net>  
To: "psc@utah.gov" <psc@utah.gov>

Sun, Oct 4, 2020 at 7:19 AM

Docket No. 17-035-61

Dear Comissioners:

October 4, 2020

We have been a grid-tied solar costumer with RMP for over 15 years and been receiving the same kWhr rate for what we use and what we sell to RMP with our home solar system. Our system which also has battery storage has worked to provide energy to the home during power failures in the RMP delivery system. It has saved us thousands of dollars in utility bills especially during the spring, summer and fall. During the last two years we have also charged our plug-in hybrid vehicle mostly from our own solar generated power. As a result our Toyota Prius has averaged over 100 mpg equivalent and substantially reduced the air pollution it would generate without our PV system.

**We believe all Utah users who install home solar systems should get the same rate per kWhr they sell to RMP as they pay when they buy electricity from RMP.**

We understand that RMP wants to maintain its profitable monopoly in supplying electric power. The proposed rate of 1.5 cents per kWhr for home solar generated power would eliminate most of the companies and the associated workers that now install home solar systems. That is what happened in Nevada when it eliminated net metering.

The Public service commission should also consider the long-term implications of consumers switching to electric and plug-in electric vehicles during the next 20 years. This will require an immense increase of electricity delivered to each home to charge the batteries of these vehicles. Home based PV systems with battery backup can provide a substantial amount of this energy, thus reducing the need for RMP to greatly expand its delivery system. Has RMP provided the cost to consumers of remote solar farms, new transmission lines and thousands of power poles, transformers and upgrades to wiring systems in homes if we maintain the current monopolistic remote generating systems?

We strongly believe the Public Service Commission should encourage the home-based solar systems by rejecting the RMP proposal to pay 1.5 cents per kWhr which they sell next door for 9.5 cents at an unfair profit.

Sincerely,

Dr. Andrew Schoenberg, PHD

Mieke Schoenberg





PublicService Commission &lt;psc@utah.gov&gt;

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**Comment on Docket No. 17-035-61**

1 message

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**Michael Heidinger** <heidinger@comcast.net>  
Reply-To: Michael Heidinger <heidinger@comcast.net>  
To: Public Service Commissioners <psc@utah.gov>

Sun, Oct 4, 2020 at 8:39 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.

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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,  
Michael Heidinger  
1902 E Sycamore Ln  
Holladay, UT 84117



PublicService Commission &lt;psc@utah.gov&gt;

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**Comment on Docket No. 17-035-61**

1 message

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**Andrea Heidinger** <heidina@comcast.net>  
Reply-To: Andrea Heidinger <heidina@comcast.net>  
To: Public Service Commissioners <psc@utah.gov>

Sun, Oct 4, 2020 at 8:51 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).

It is imperative that we ensure clean energy as the norm for our growing population and 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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Sincerely,  
Andrea Heidinger  
[1902 E Sycamore Ln](#)  
[Holladay, UT 84117](#)



PublicService Commission &lt;psc@utah.gov&gt;

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## Rooftop solar

1 message

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**Thomas Filgo** <tpfilgo@gmail.com>  
To: PSC@utah.gov

Sun, Oct 4, 2020 at 9:26 AM

As a rooftop solar user for over 10 yrs, my wife and I feel we have supported a new clean industry, employed and provided work for people in a new commercial sector, and done our share to help clean the air we breathe. We have given back to the power grid and helped to flatten the peak demand curve for the power company.

So why is it that your commission continues to side with the power company by trying discourage the use of what is clearly the future of energy on this planet, and in particular, the intermountain west where air quality is unhealthy for an increasing number of days per year?

Please consider the name of the commission on which you sit when you continue to vote in the interest of power company share holders instead of the public interest which you were chosen to serve.

Rooftop solar should be encouraged for the greater good of our community instead of being frowned upon as a competitor of the monopoly corporation that is Rocky Mountain Power.

Thom Filgo  
11721 Highland Oaks Cir  
Sandy, UT 84092  
801-231-5509

Sent from my iPad



PublicService Commission &lt;psc@utah.gov&gt;

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**Docket No. 17-035-61 Public Comment**

1 message

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**Christine Schulz (ces5482@truman.edu) Sent You a Personal Message**

Sun, Oct 4, 2020 at 9:34 AM

&lt;automail@knowwho.com&gt;

To: psc@utah.gov

Dear Utah Public Service Commission,

Though we can't make a full shift to alternative resource energy, we can start taking small steps and trying out alternative energy sources. It is an injustice to humanity to stifle innovation and creativity in looking for alternative energy sources. Rocky mountain power will still get their money. Don't do it at the expense of innovation.

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,

Christine Schulz  
310 E 500 S, Apt 500  
Salt Lake City, UT 84111  
[ces5482@truman.edu](mailto:ces5482@truman.edu)  
(847) 609-0507

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](mailto:core.help@sierraclub.org) or (415) 977-5500.



PublicService Commission &lt;psc@utah.gov&gt;

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**Comment on Docket No. 17-035-61**

1 message

**Andrew Hatton** <aj.hattonfl@gmail.com>

Sun, Oct 4, 2020 at 9:55 AM

Reply-To: Andrew Hatton &lt;aj.hattonfl@gmail.com&gt;

To: Public Service Commissioners &lt;psc@utah.gov&gt;

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.

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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,  
Andrew Hatton  
[913 N 920 W](#)  
[Orem, UT 84057](#)



PublicService Commission &lt;psc@utah.gov&gt;

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**Comment on Docket No. 17-035-61**

1 message

**Curt Eddy** <Curt.eddy@gmail.com>

Sun, Oct 4, 2020 at 11:22 AM

Reply-To: Curt Eddy &lt;Curt.eddy@gmail.com&gt;

To: Public Service Commissioners &lt;psc@utah.gov&gt;

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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Sincerely,

Curt Eddy

138 E 12300 S

Draper, UT 84020



PublicService Commission &lt;psc@utah.gov&gt;

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**Docket No. 17-035-61 Public Comment**

1 message

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**Kaylin Richardson (kaylinrichardson@hotmail.com) Sent You a Personal Message**

Sun, Oct 4, 2020 at 2:00 PM

&lt;automail@knowwho.com&gt;

To: psc@utah.gov

Dear Utah Public Service Commission,

I just gave birth a daughter in June, and we have 20 solar panels on our roof. We made this investment because we believe in a bright future for our daughter. If we do not begin committing to renewable energy, and making it easy for a populace to achieve this, we have a very dark future ahead. Please do the right thing, and reward people that commit to solar power, and help them make it happen. Please don't enable a power company to set us back and delay progress our state sorely needs. Please put the future first, not corporate dollars.

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,

Kaylin Richardson  
329 Matterhorn Drive  
Park City, UT 84098  
[kaylinrichardson@hotmail.com](mailto:kaylinrichardson@hotmail.com)  
(612) 616-4948

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](mailto:core.help@sierraclub.org) or (415) 977-5500.



PublicService Commission &lt;psc@utah.gov&gt;

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**Comment on Docket No. 17-035-61**

1 message

**Brent Bowman** <brent2489@gmail.com>

Sun, Oct 4, 2020 at 2:40 PM

Reply-To: Brent Bowman &lt;brent2489@gmail.com&gt;

To: Public Service Commissioners &lt;psc@utah.gov&gt;

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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Sincerely,  
Brent Bowman  
5947 E Pioneer Ridge Cir  
Salt Lake City, UT 84108



PublicService Commission &lt;psc@utah.gov&gt;

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**Comment on Docket No. 17-035-61**

1 message

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**Fredrick Boehmer** <fboehmer1@gmail.com>  
Reply-To: Fredrick Boehmer <fboehmer1@gmail.com>  
To: Public Service Commissioners <psc@utah.gov>

Sun, Oct 4, 2020 at 2:43 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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Sincerely,  
Fredrick Boehmer  
[1225 Pinecrest Canyon Rd](#)  
[Salt Lake City, UT 84108](#)



PublicService Commission &lt;psc@utah.gov&gt;

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**Comment on Docket No. 17-035-61**

1 message

**Cindy Rice** <crice@pullman.com>

Sun, Oct 4, 2020 at 3:36 PM

Reply-To: Cindy Rice &lt;crice@pullman.com&gt;

To: Public Service Commissioners &lt;psc@utah.gov&gt;

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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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.

A personal investment in power generation should be incentivized. Pollution is choking the Salt Lake Valley and solar is a mitigating technology. Thank you.

Sincerely,  
Cindy Rice

724 N. Freeze Creek Cir.  
Salt Lake City, UT 84108



PublicService Commission &lt;psc@utah.gov&gt;

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**Comment on Docket No. 17-035-61**

1 message

**Timothy Beals** <orthoo@me.com>

Sun, Oct 4, 2020 at 4:22 PM

Reply-To: Timothy Beals &lt;orthoo@me.com&gt;

To: Public Service Commissioners &lt;psc@utah.gov&gt;

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,  
Timothy Beals  
[742 N Pioneer Fork Rd](#)  
[Salt Lake City, UT 84108](#)



PublicService Commission &lt;psc@utah.gov&gt;

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**Comment on Docket No. 17-035-61**

1 message

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**Kimberly Coudreaut** <kcoud33@gmail.com>  
Reply-To: Kimberly Coudreaut <kcoud33@gmail.com>  
To: Public Service Commissioners <psc@utah.gov>

Sun, Oct 4, 2020 at 5:21 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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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,  
Kimberly Coudreaut  
165 N. Silver Oak Rd.  
Salt Lake City, UT 84108



PublicService Commission &lt;psc@utah.gov&gt;

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**Comment on Docket No. 17-035-61**

1 message

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**Ashley Greenwell** <agreenwell2@gmail.com>  
Reply-To: Ashley Greenwell <agreenwell2@gmail.com>  
To: Public Service Commissioners <psc@utah.gov>

Sun, Oct 4, 2020 at 8:55 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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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.

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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,  
Ashley Greenwell  
[72 N Pioneer Fork Rd](#)  
[salt Lake City, UT 84108](#)



PublicService Commission &lt;psc@utah.gov&gt;

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**DocketNo. 17-035-61**

1 message

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**Lyen Huang** <lyen.huang@hsc.utah.edu>  
To: "psc@utah.gov" <psc@utah.gov>

Sun, Oct 4, 2020 at 9:06 PM

Public Service Commission members,

I am a homeowner who recently put up enough solar panels to cover 95% of my energy needs (including an EV). I did this because I believe that renewable energy is the way forward for Utah, particularly since air pollution and climate change are major barriers to our health and economy. Renewable energy (and particularly solar) creates many high-paying high-quality jobs in Utah. Shutting down that industry here will just move the jobs to other states who embrace solar and we will find ourselves with less jobs and dependent on their energy in the years to come.

As a state that promotes independence and self-sufficiency, I believe Utah should find ways to encourage its citizens to add more solar, not less. Household solar is independent and clean energy. If anything, rather than reducing rates we should reinstate the original Net Metering system. This will increase adoption of solar particularly as prices continue to drop in the coming years.

Sincerely,  
Lyen Huang, MD, MPH



PublicService Commission &lt;psc@utah.gov&gt;

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**Docket No. 17-035-61**

1 message

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**Steven Stucki** <steven@smartwavesolar.com>

Sun, Oct 4, 2020 at 10:10 PM

To: psc@utah.gov

PSC -

My name is Steven and on September 1st I made a huge life change. I left an incredible job to seek a new, and exciting opportunity in the solar industry here in Utah. I was motivated by working in an industry that supports sustainability and empowers individuals to do the same.

The prospect of the solar industry being totally decimated in Utah because Rocky Mountain Power wants to tighten their controlling grip on the power industry here in Utah is not only an affront to tens of thousands of people here in the state that support renewable energy but a direct threat to my livelihood, and the safety of my wife and 3 children for whom I provide.

Please do not let Rocky Mountain Power have their way. They do not represent the people, and are not motivated by what's best for our state. They're motivated by what's best for their investors.

Thank you,  
Steven

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**Steven Stucki**

Energy Consultant | Utah

**P:** 801 830 7050**E:** steven@smartwavesolar.com



PublicService Commission &lt;psc@utah.gov&gt;

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**Docket No. 17-035-61 Public Comment**

1 message

**Amanda Dillon (adillon07@gmail.com) Sent You a Personal Message**

Mon, Oct 5, 2020 at 8:12 AM

&lt;automail@knowwho.com&gt;

To: psc@utah.gov

Dear Utah Public Service Commission,

Please don't get rid of the incentive to help clean our air by making solar power more difficult to get for most of us! Please save Utah Solar!!!

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,

Amanda Dillon  
420 E S Temple # 100  
Salt Lake City, UT 84111  
[adillon07@gmail.com](mailto:adillon07@gmail.com)  
(626) 656-3652

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](mailto:core.help@sierraclub.org) or (415) 977-5500.



PublicService Commission &lt;psc@utah.gov&gt;

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**Docket No. 17-035-61**

1 message

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**Fred Silva** <fred.silva@comcast.net>  
To: "psc@utah.gov" <psc@utah.gov>

Mon, Oct 5, 2020 at 8:17 AM

I understand that Rocky Mountain Power is attempting to severely decrease the credits for rooftop solar. Given the growth of population in Utah, rooftop solar makes the most sense in terms of clean energy. There is more room on home rooftops vs allocating fields for solar panels. For Rocky Mountain Power to discourage rooftop solar with such a severe drop in compensation, it is clear that the company is not interested in working toward cleaner air and energy in Utah. If Rocky Mountain Power's motivation in seeking this change is driven by profit (which sounds like it is the case), perhaps Rocky Mountain Power should change their business model, and demonstrate they are interested in cleaner energy by engaging in rooftop solar installation. I ask that you deny Rocky Mountain Power's petition, and continue to promote rooftop solar. Thank you for your time.

Fred Silva



PublicService Commission &lt;psc@utah.gov&gt;

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**Comment on Docket No. 17-035-61**

1 message

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**Fabiana Ostronoff** <fao9003@gmail.com>  
Reply-To: Fabiana Ostronoff <fao9003@gmail.com>  
To: Public Service Commissioners <psc@utah.gov>

Mon, Oct 5, 2020 at 8:43 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,  
Fabiana Ostronoff  
1063 Lincoln St  
Salt Lake City, UT 84105



PublicService Commission &lt;psc@utah.gov&gt;

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**Docket No. 17-035-61**

1 message

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**Judith Warner** <judith.warner@hsc.utah.edu>  
To: "psc@utah.gov" <psc@utah.gov>

Mon, Oct 5, 2020 at 9:26 AM

Dear committee, I have been a solar customer since 2012, and in the past 8 years have seen Rocky Mountain power make repeated, concerted efforts to drive solar power out of the market. I am writing to express my profound disappointment and displeasure that they are making yet another attempt. To be clear, they have already increased my base power charge, so that even when I am using no grid power, I pay \$26 per month (for a single family home). To now try to reduce the credit rate by this much, when they should by all that is right be increasing the credit rate is unconscionable. The committee would be better serving our community by adopting the [Vote Solar study recommendation of 22¢ per kilowatt-hour](#).

On a personal note, my solar panels were critically important in preventing food waste during our recent Prolonged power outage.

These are additional points:

- Rooftop solar is good for our health and for the environment.
- The power generated by rooftop solar means coal not burned.
- Air pollution and climate change are pressing threats to Utah and Utahns bear the burden of these costs, not Rocky Mountain Power.
- Rooftop solar creates grid resilience and flexibility.
- The grid is changing, and distributed power generation gives ordinary Utahns the best chance to benefit.
- Solar is an economic engine in Utah.
- Thousands would be out of work overnight if Rocky Mountain Power's proposed export credit rate is implemented in the new year.
- Consumer choice is at issue.
- Utahns should have reasonable and affordable access to independent clean energy.
- Rocky Mountain Power is acting as a monopoly trying to crush the competition at the expense of ratepayers.

Sincerely,

Judith Warner



PublicService Commission &lt;psc@utah.gov&gt;

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**Docket No. 17-035-61**

1 message

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**Stephen Trimble** <steve@stephentrimble.net>

Mon, Oct 5, 2020 at 11:08 AM

To: psc@utah.gov

Good morning—

Devaluing solar rooftop input to the grid is irresponsible. We need the maximum amount of solar—and the maximum public involvement—and we transition away from fossil fuels. Given our red bulls-eye on the maps of heat and drought coming from climate change and our air pollution, please act responsibly and encourage rather than discourage solar.

Thank you, Stephen Trimble  
[70 W Apricot Ave, SLC, UT 84103](#)

[www.stephentrimble.net](http://www.stephentrimble.net)  
801-819-2448



PublicService Commission &lt;psc@utah.gov&gt;

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**Docket No. 17-035-61 Public Comment**

1 message

**Elise Walker (elise.h.e.walker@gmail.com) Sent You a Personal Message**

Mon, Oct 5, 2020 at 11:32 AM

&lt;automail@knowwho.com&gt;

To: psc@utah.gov

Dear Utah Public Service Commission,

I grew up in Utah and loved living here, particularly because of the beautiful natural landscapes that can be enjoyed by hiking, skiing, and more. My husband and I recently moved back to Salt Lake City after our graduate studies, and one of the first things we did was invest in a rooftop solar installation for our new home. My husband works in the energy industry and is very informed about energy policies and climate change, and we strongly believe that it is vital to transition to renewable energy generation in Utah. The solar industry is one excellent opportunity. Utility customers should have the choice to invest in solar energy and should receive fair rates in return for their energy contributions. Rocky Mountain Power's proposed rate decrease completely devalues the benefits that solar installations provide to both the utility (decreased energy line losses and lower infrastructure costs) and the community (health and climate benefits as well as jobs and economic growth).

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,

Elise Walker  
312 G Street  
Salt Lake City, UT 84103  
[elise.h.e.walker@gmail.com](mailto:elise.h.e.walker@gmail.com)  
(435) 213-6079

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](mailto:core.help@sierraclub.org) or (415) 977-5500.



PublicService Commission &lt;psc@utah.gov&gt;

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**Docket No. 17-035-61**

1 message

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**Kelly Connolly** <performance.medical@att.net>  
To: psc@utah.gov

Mon, Oct 5, 2020 at 12:03 PM

Dear Utah Public Service Commission members,

With the air quality issues in Utah, we were astonished to hear about the proposal to decrease the export rate of rooftop solar power. If you significantly lower the compensation rate for solar, far fewer people will invest in their own systems. That will lead to even worse air quality and contribute further to climate change's drought and fire conditions here in Utah.

As one of the five sunniest states in the country, we have an incredible renewable resource. We should encourage cleaner energy everywhere possible, not discourage it.

Economically speaking, the solar industry supports thousands of jobs. This is not the time to implement major changes in the solar industry. We need all the economic development we can get right now.

Your decision will significantly impact the air, climate and economy of our state. We strongly encourage you to make the right decision, to not decrease the export rate of rooftop solar.

Thank you,

Kelly  
Kelly Connolly  
[Performance.Medical@att.net](mailto:Performance.Medical@att.net)



PublicService Commission &lt;psc@utah.gov&gt;

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**Docket No. 17-035-61 Public Comment**

1 message

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**Michelle Diebele (krzy4anmls@yahoo.com) Sent You a Personal Message**

Mon, Oct 5, 2020 at 12:18 PM

&lt;automail@knowwho.com&gt;

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.

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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,

Michelle Diebele  
756 W Monte Azul  
Taylorsville, UT 84123  
[krzy4anmls@yahoo.com](mailto:krzy4anmls@yahoo.com)  
(801) 815-0611

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](mailto:core.help@sierraclub.org) or (415) 977-5500.



PublicService Commission &lt;psc@utah.gov&gt;

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**Re: Request to provide public comment in Docket No. 17-035-61**

1 message

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**Naomi C Franklin** <franklin@biology.utah.edu>  
To: PublicService Commission <psc@utah.gov>

Mon, Oct 5, 2020 at 11:09 AM

I followed the instructions for telephone below at 9:40 AM, but received only the message that number was incorrect. Therefore I shall type my comments here:

Comments by Naomi Franklin re Public Service Committee Hearing re Rooftop Solar Charges on 10/5/2020.

For many decades we have been depending upon burning fossil fuels (coal and petroleum) for heating and transportation. The consequences upon our environment are becoming more and more evident upon climate and health, in ways not remediable. In Utah this has been acknowledged by both the State and several of its major cities by legal commitments to use only 'clean energy' in the future. Most accessible is solar energy, conveniently harvested on roof-tops and conveyed directly to homes and vehicles. The notable cooperation by Rocky Mountain Power in designing this widespread private development has been admirable!

That cooperative development must be encouraged, benefitting our whole community. While the use of fossil fuels becomes eliminated. May our best minds be engaged in calculating the monetary side of this arrangement!

On Oct 1, 2020, at 8:17 AM, PublicService Commission <psc@utah.gov> wrote:

Hello,

Thank you for contacting the Public Service Commission of Utah.

Your assigned time to provide your comments is at 9:45 pm on Monday, October 5, 2020.

Here is the link and telephone number to join the hearing through Google Meet. You may use either, and may choose to connect by video or by audio only.

<https://meet.google.com/mfz-ngjp-okc>

484-326-5972 / PIN: 467 910 388#

The Commission Chair will call your name when your turn comes. Please be ready and remember that public comments are limited to 3 minutes. If you need more than 3 minutes you may provide additional comments after all other scheduled commenters have finished.

If you would like to view the hearing before and after your scheduled time slot, you should disconnect from Google Meet and access the hearing's live stream through the PSC's YouTube channel. A link to that channel will be available during the hearing on the PSC website: [psc.utah.gov](https://psc.utah.gov)

Thank you

On Wed, Sep 30, 2020 at 6:57 PM Naomi C Franklin <franklin@biology.utah.edu> wrote:

|

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Public Service Commission of Utah  
[160 E 300 S, 4th Floor](#)  
[Salt Lake City, UT 84111](#)  
801-530-6716  
[psc@utah.gov](mailto:psc@utah.gov)





PublicService Commission &lt;psc@utah.gov&gt;

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**Comment on Docket No. 17-035-61**

1 message

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**Ginger McKenna** <gmw727@gmail.com>  
Reply-To: Ginger McKenna <gmw727@gmail.com>  
To: Public Service Commissioners <psc@utah.gov>

Mon, Oct 5, 2020 at 1:35 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.

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,  
Ginger McKenna  
[6494 South 990 West](#)  
[Murray, UT 84123](#)



PublicService Commission &lt;psc@utah.gov&gt;

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**Docket No. 17-035-61**

1 message

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**Ryan Stucki** <ryan@smartwavesolar.com>  
To: PublicService Commission <psc@utah.gov>

Mon, Oct 5, 2020 at 1:46 PM

Dear members of the Utah Public Service Commission:

I'm emailing you this letter, but I've also posted a copy here on our website: <https://smartwavesolar.com/blog-1/f/letter-to-the-utah-public-service-commission-about-net-metering>

Sources for my claims are listed below.

Many parts of the US have been reviewing solar net metering over the last several years. Most states still offer one to one net metering, or very close to it. A few states have experimented with reduced net metering only to experience massive job loss, protests, and even lawsuits. After experiencing major problems, Nevada and Maine have been the first to roll back the solar-harming net metering changes they had implemented previously. Other states have wisely waited to collect more data before making changes. Montana and New York chose to postpone net metering changes within the last year. Florida and Arizona both voted against net metering reductions in the last few weeks. Three major deciding factors for why they voted this way: 1). The amount of electricity being shared with the grid from solar is still too negligible to worry about "cost shifting" yet. 2). At a time when Covid-19 is rocking our economy, why cripple the solar industry and kill a bunch of jobs? 3). The benefits of solar are massive to our economy, consumers, and the environment.

Make no mistake, the net metering changes proposed by Rocky Mountain Power (RMP) will almost completely kill the solar industry in Utah. With federal and state tax credits stepping down again in 2021, *even a slight reduction in net metering rates in Utah could be devastating.* Solar saves people a lot of money, it's great for the environment, it's great for the job market, and it provides consumers with an option instead of having to buy electricity from a power company with a monopoly. Mark Ruffalo (amongst other celebrities and politicians who showed up for a protest in Nevada) said it best: "I'm here to fight for solar today... This is reverse Robin Hood, taking from the poor and giving to the monopoly."

Utility companies' main argument for net metering reductions is "cost shifting." Saying that solar customers aren't paying their fair share to maintain the grid. Studies have shown that cost shifting is negligible until there is 10% market penetration with solar (and Utah is well below that number). Even at 10% penetration, the cost shifting ends up being about 1/2 of a penny per kWh of electricity. Instead of talking about cost shifting, the real question we should be asking is "Why, with their monopoly, is RMP allowed to charge significantly more for electricity than the smaller municipal power companies in Utah?" The premium RMP is charging compared to other Utah power companies is often 1-5 cents per kWh. RMP has also disclosed that they are able to buy electricity for 1.5 cents per kWh wholesale, but they are charging 8.8 - 14.4 cents per kWh, as much as a 960% markup. Why are we talking about a fraction of a penny for cost shifting? Any minuscule cost shifting taking place right now sounds like a small thing to ask of RMP in exchange for the monopoly they enjoy, and the premium prices they are being allowed to charge.

As the CEO of Smart Wave Solar (operating exclusively in Utah) I speak on behalf of our 58 employees and their families (along with the other 7107 people working in the solar industry in

Utah and their families) when I ask the Utah Public Service Commission to not make Utah a net metering guinea pig. We strongly urge you to not only reject the proposed changes, but *change net metering back to one to one*. At a time when the economy and job market have been rocked by Covid-19, this isn't the time to hurt our local economy further by crippling the solar industry. Instead, we ask that you reevaluate net metering again in two years when there is more data and better precedents throughout the country.

Thank you for your time and consideration.

Sincerely,

Ryan Stucki - CEO of Smart Wave Solar

**Sources:**

**Most states still offer one to one net metering or close to it:**

<https://www.solarpowerworldonline.com/2020/03/which-states-offer-net-metering/>

[https://en.wikipedia.org/wiki/Net\\_metering](https://en.wikipedia.org/wiki/Net_metering)

**Nevada and Maine's terrible experience with reduced net metering:**

[https://www.pv-magazine.com/2016/01/13/1000-nevadans-protest-retroactive-changes-to-net-metering\\_100022773/](https://www.pv-magazine.com/2016/01/13/1000-nevadans-protest-retroactive-changes-to-net-metering_100022773/)

<https://www.maine.gov/governor/mills/news/governor-mills-signs-legislation-restore-net-metering-incentivize-growth-solar-power-maine>

**Why other states have wisely decided to wait to change net metering:**

<https://electrek.co/2020/09/23/egeb-what-happened-at-floridas-solar-net-metering-meeting/>

<https://earthjustice.org/news/press/2019/montana-public-service-commission-rejects-demand-charge-implements-lower-rate-for-new-solar-customers>

<https://www.utilitydive.com/news/new-york-adopts-net-metering-alternative-delays-implementation-due-to-covi/581812/>

**Cost shifting isn't a factor in Utah yet:**

<https://pv-magazine-usa.com/2017/07/12/net-metering-is-dead-long-live-net-metering/>

**5% market penetration for solar:**

Roughly 41,000 homes with solar and a total of 701,000 homes

<https://www.census-charts.com/HF/Utah.html>

Ryan Stucki - CEO

**Smart Wave Solar**

668 W 14600 S #200

Bluffdale, UT 84065

801-803-8676 (mobile)



PublicService Commission &lt;psc@utah.gov&gt;

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## Docket No. 17-035-61 Comments

1 message

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**don.garner@comcast.net** <don.garner@comcast.net>  
To: psc@utah.gov

Mon, Oct 5, 2020 at 1:49 PM

Dear Members of the Utah Pubic Service Commission,

I write to oppose the rather extreme 83% reduction in rooftop solar credits proposed by Rocky Mountain Power (RMP). Such a reduction would likely have a correspondingly extreme negative effect on the state's solar industry and the availability of clean energy in the state.

The RMP proposal fails to recognize the value of important benefits, both to the utility itself and to the community. The utility benefits from rooftop solar by reducing exposure to price volatility and by avoiding investment in production assists. The community benefits from the good solar jobs and associated tax revenue, and from cleaner air. These, and other benefits are not accounted for.

RMP needs to be compensated fairly for providing grid distribution services, but otherwise needs to provide credits for the total value of the power put back on the grid from rooftop solar systems.

Shutting down the solar industry is not in the best interest of the citizens of Utah. We should be looking for ways to encourage solar energy production, not discourage it, and should be compensating rooftop solar producers for all the benefits their power provides.

Respectfully,  
Donald Garner

1536 Chandler Drive  
Salt Lake City, UT 84103  
801-532-3261

Sent from my iPad



PublicService Commission <psc@utah.gov>

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## Docket No. 17-035-61

1 message

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**Jordan Seldin** <nerdskier@mac.com>  
To: PSC@utah.gov

Mon, Oct 5, 2020 at 2:22 PM

I support the solar panel industry. Please keep investing in renewable resources.

Sent from my iPhone



PublicService Commission &lt;psc@utah.gov&gt;

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**Docket No. 17-035-61 Public Comment**

1 message

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**James Magruder (jmack-67@hotmail.com) Sent You a Personal Message**

Mon, Oct 5, 2020 at 2:34 PM

&lt;automail@knowwho.com&gt;

To: psc@utah.gov

Dear Utah Public Service Commission,

Utah is already a sun-blasted hellscape. Rooftop solar just makes sense.

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 Magruder  
5489 s 2700 w  
Roy, UT 84067  
[jmack-67@hotmail.com](mailto:jmack-67@hotmail.com)  
(801) 755-9274

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](mailto:core.help@sierraclub.org) or (415) 977-5500.



PublicService Commission &lt;psc@utah.gov&gt;

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**Docket # 17-035-61**1 message

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**David Bennett** <davidbennett@mac.com>  
To: PublicService Commission <psc@utah.gov>

Mon, Oct 5, 2020 at 2:41 PM

Rocky Mountain Power (RMP) has consistently fought roof-top solar. Their current reimbursement proposal of 1.2 cents is SO ridiculous that it should be completely rejected, and the commission should order a return to net-metering.

RMP's business plan is based upon coal—they own the coal mines and the coal generating power plants. For years their Integrated Resource Plans (IRP) have rejected solar as having a significant role in the generation of power in Utah. In recent years with the decline of the coal industry they have been more receptive, but ONLY if they own and control the solar panels. In the 2017 rate case they tried to decimate roof-top solar but Governor Herbert stepped in and brokered the current arrangement that set the reimbursement rate at 9.2 cents per KWH.

RMP conducted a study of solar users. Despite their having the ability to look at an unlimited number of users, they chose to examine the solar usage of 70-customers. The organization Vote Solar looked at 1,214 customers. Issues that RMP rejected as having a role in the savings resulting from roof-top solar include: investment; financial risk; carbon requirements; climate and health; and jobs and economy. It is easy to see how when those issues are excluded that the value of each KWH of solar is only 1.5 cents as opposed to Vote Solar's study which came up with a value of 22 cents.

Climate change is very real—look no further than the devastating fires consuming the west coast. As a society we have to do all we can if there is any chance of slowing or even reversing this phenomena. That includes ending the practice of burning fossil fuels and replacing that power with renewable energy. Roof-top solar is a part of that equation. When individuals generate a portion of their own power, they pay more attention to their usage and are more likely to conserve their use of energy. **The excess power generated that is returned to the grid goes to others within the neighborhood or the same geographic region, thereby saving distribution costs and power degradation, that occur to generate and transmit power sometimes hundreds of miles.** Roof-top solar subscribers pay for their systems and this system is an efficient method of generating and sharing power.

The other issue is jobs. The solar industry in Utah currently employs approximately 7,000 workers (v. only about 2,500 in the entire coal industry). If RMP's proposal were to be implemented, or even if the reimbursement rate was doubled what has been proposed, the entire solar industry in Utah goes out of business. There will be no new solar installations with that reimbursement-rate.

Warren Buffett, through his Pacific Corp company which includes RMP is using their monopoly status to attempt to decimate the roof-top solar business. The PSC cannot allow this to occur. Using their proposed 1.5 cents reimbursement cost is not a starting point—it is a ridiculous rate that shows their contempt for roof-top solar. The answer is to reject their proposal and return to the only fair method for compensating customers who incur the cost of placing solar panels on their roof: Net-Metering.

This September in South Carolina, environmental groups, the solar industry, and governmental agencies struck a deal with Duke Energy to provide roof-top solar with net-metering. Users get up-front savings when going solar, incentives to provide energy during peak periods of time, and a guarantee of 25-years that net-metering will stay in place. There is NO reason that a similar arrangement cannot be struck with RMP. The first step is for the PSC to REJECT this current proposal and require the parties to truly negotiate a proper agreement.

Thank you for your consideration.



PublicService Commission &lt;psc@utah.gov&gt;

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**Comment on Docket No. 17-035-61**

1 message

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**Susana Williams Keeshin** <susana.williams09@gmail.com>  
Reply-To: Susana Williams Keeshin <susana.williams09@gmail.com>  
To: Public Service Commissioners <psc@utah.gov>

Mon, Oct 5, 2020 at 3:08 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.

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,  
Susana Williams Keeshin  
[135 N Young Oak RD](#)  
[Salt Lake City, UT 84108](#)



PublicService Commission &lt;psc@utah.gov&gt;

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**Docket No. 17-035-61 public comment from Stan Holmes**

1 message

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

Mon, Oct 5, 2020 at 3:05 PM

To: psc@utah.gov

Cc: stholmes3@xmission.com

Dear Commissioners LeVar, Clark, and Allen.

My name is Stan Holmes. I am a Salt Lake City resident who has solar panels on my home and have been a net-metering customer under RMP's Schedule 135 since 2015.

Copied below is the oral presentation I gave to you this afternoon, Monday, 10-5-2020, during the public hearing :

I urge you to reject the most recent Rocky Mountain Power / PacifiCorp anti-rooftop solar proposal. The utility's proposed solar devaluation would have a wide range of negative impacts including some I'll allude to now. Rejecting RMP's proposal would better serve the interests of consumers, ratepayers, and the general public. Why? Because the utility's Schedule 137 proposal:

- 1) fails to accurately account for the grid and non-grid benefits of decentralized, neighborhood renewable power generation that supplements the utility-owned centralized, distant facilities.
- 2) fails to address how rooftop solar growth would help mitigate the increasing financial liabilities ratepayers will suffer as costs of carbon-generated electricity inevitably rise under market pressures, tougher federal laws, and probable litigation;
- 3) perpetuates cost shifting from utility stockholders to all ratepayers suffering utility-generated societal harms and disproportionately hurts those who would make personal investments to generate clean energy from their homes and businesses; and,
- 4) discriminates against low-income families who suffer more from climate change related health, education, and economic injuries caused by utilities like RMP that stifle clean energy growth in order to protect their fossil fuel assets as long as regulators allow them to do so.

Rocky Mountain Power pitches itself as committed to renewable energy. But its reduced rooftop solar export credit rate would hobble Utah's clean energy industry by discouraging customer investments in at-home and at-business solar power generation.

RMP's 20-year [resource plan](#) actually increases the use of coal through 2023. And twenty years from now, Rocky Mountain Power still would rely on its coal-fired power plants. Under the corporate plan, Utah is the last state to go clean from coal.

Meanwhile, our monopoly utility expects ratepayers and taxpayers to continue subsidizing the corporation's bottom line despite its growing threat to our collective well-being. The Commission should hand RMP a big "No" to its unjust, selfish, and poorly researched proposal.

I urge the PSC to reestablish a net-metering system for all new rooftop solar customers wherein the energy export credit rate is a value no less than one-to-one with the retail rate that RMP would otherwise charge the customer at the time of his/her energy export.

Thank you.

I appreciate your thoughtful attention to the points raised by me and by others similarly concerned that RMP's current proposal for Schedule 137 is a mistake that should be rejected.

Stan Holmes  
846 N. East Capitol Blvd.  
SLC, Utah 84103  
<[stholmes3@xmission.com](mailto:stholmes3@xmission.com)>



PublicService Commission &lt;psc@utah.gov&gt;

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**Docket No. 17-035-61**1 message

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**Jeanne Evenden** <jevenden7@gmail.com>  
To: psc@utah.gov  
Cc: Jeanne Evenden <jevenden7@gmail.com>

Mon, Oct 5, 2020 at 3:17 PM

Net metering benefits were a major consideration for me when I invested in roof top solar on my home in 2015. I appreciate that under Rocky Mountain Power's existing proposal that my benefits would be extended until 2032, but I am highly alarmed at their proposal to slash the compensation rate for new solar investors from 9.4 cents to 1.5 cents per kilowatt hour - a mind-boggling 84% decrease. They have based this proposal on a deceptively narrow study involving only a few dozen customers, which failed to consider economic and environmental benefits. This study is suspect for exaggerating costs incurred, while minimizing benefits. The proposal would have a dire impact on the roof top solar industry in Utah.

In comparison, Vote Solar's independent study analyzed over 3300 customers, and considered a broader base of applicable metrics such as environmental and health benefits, economics - including job creation and retention, and the importance of grid flexibility which helps the utility avoid energy and capacity costs. Based on this more comprehensive and thoughtful study, their analysis concluded a compensation rate of 22.6 cents per kilowatt hour.

Nevada - a state with similar solar resources to Utah - attempted a similar, although not even as drastic, cut in customer compensation rates and higher fixed fees in 2015. Installations screeched to a halt and the market imploded. The State responded by reinstating net metering and the market has responded well. Thousands would be out of work in Utah if we needlessly go down this same path.

My interest in acquiring roof top panels was a conscious choice to reduce my environmental footprint. Utah's air quality needs whatever help it can get, and I believe all the stops should be pulled out to that end. Although my system is small, I am proud of the fact that I have dialed down my use such that I contribute energy back to the grid every year. Although it would be nice to be compensated for these excess kilowatt hours - or at least be able to roll them over into another calendar year - I am satisfied to be adding to the greater environmental good in Utah.

The 2019 Integrated Resource Plan under which Rocky Mountain Power operates, advertises investments in a diversity of new resources, including renewables, and outlines new infrastructure investments that are needed to improve grid resilience so that lowest-cost renewable resources can flow freely to customers. The Plan also provides the roadmap by which they will dramatically reduce greenhouse gas emissions over the next 20 years. . .and shows that, by 2030, emissions will have been reduced by nearly 60% from 2005 levels. For Rocky Mountain Power to so significantly reduce the compensation rate to new solar customers violates my basic trust in this public utility. It would constitute a major disincentive for future investment in solar energy, while Rocky Mountain Power professes a strong and appropriate desire to achieve just the opposite.

In summary, please do what is best for Utah's energy future and our environment: 1) deny Rocky Mountain Power's proposal to lowball the value of roof top solar; 2) reinstate the net metering program; and 3) adopt the Vote Solar study compensation rate recommendation to reflect the true benefits created by roof top solar. . .or enlist an *independent third party* to conduct a fair and legitimate analysis.

Thank you for the opportunity to comment.

Sincerely,  
Jeanne Evenden



PublicService Commission &lt;psc@utah.gov&gt;

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**Docket No. 17-035-61 Public Comment**

1 message

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**Jennifer Bodine** <jenniferbodine6@gmail.com>  
To: psc@utah.gov

Mon, Oct 5, 2020 at 3:17 PM

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.

I am a homeowner who chose to put solar on my home in 2012. I made that investment to not only be a part of our air quality and climate solution but because it made economic sense. If you approve RMP's proposal you will effectively take that individual choice away from everyone in the future because solar will be severely undervalued and the payback will be decades out.

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,

Jenn Bodine  
5083 Fillmore Ave.  
Ogden, UT



PublicService Commission &lt;psc@utah.gov&gt;

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**Docket No 17-035-61**

1 message

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**Jason Hunt** <jason.hunt@hsc.utah.edu>  
To: "psc@utah.gov" <psc@utah.gov>

Mon, Oct 5, 2020 at 3:22 PM

Myself and my family are vehemently opposed to the new docket. Utah is suffering from worsening air quality and the use of coal is, in large part, responsible. I am a cancer physician that sees the effects of environmental toxins daily. We need to encourage solar for our health and the health of our children and grand-children.

Also, solar supports many jobs in Utah.

Thanks,

Jason P. Hunt, MD

801-499-0993



PublicService Commission &lt;psc@utah.gov&gt;

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**Docket No. 17-035-61**

1 message

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**Rajeev Balasubramonian** <rajeev@cs.utah.edu>  
To: psc@utah.gov

Mon, Oct 5, 2020 at 3:46 PM

Hello,

I'm writing to express my grave concern regarding Rocky Mountain Power's proposed reduction to the solar export credit rate. Utah has the potential to be a leader in the solar industry, introducing good jobs to the local economy. Solar investments will be vital as we try to curtail the effects of climate change. I also value my freedom to install solar panels that can keep me self-sufficient. RMP's proposal will decimate all of the above by making solar panels cost-ineffective. It is an attempt to move our economy away from renewables and towards coal, an attempt that will inevitably go bust, given how the entire world is transitioning away from coal. I sincerely hope the Commission will reject this proposal.

Thank you.

Rajeev Balasubramonian, Sandy, UT 84093.



PublicService Commission &lt;psc@utah.gov&gt;

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**Comment on Docket No. 17-035-61**

1 message

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**Katie Roe** <KatieWintersRoe@gmail.com>  
Reply-To: Katie Roe <KatieWintersRoe@gmail.com>  
To: Public Service Commissioners <psc@utah.gov>

Mon, Oct 5, 2020 at 4:40 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.

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,  
Katie Roe  
171 N. Gravelly Lane  
Salt Lake City, UT 84108



PublicService Commission &lt;psc@utah.gov&gt;

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## Solar Power Cost Change

1 message

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**Gary Horton** <gh.triton@gmail.com>  
To: psc@utah.gov  
Cc: Kristi Horton <pcswimmom@gmail.com>

Mon, Oct 5, 2020 at 4:50 PM

To Whom it May Concern,

I am currently considering the installation of solar power for my home. I am writing this because it has been brought to my attention that Rocky Mountain Power (RMP) is desiring to propose a cost change to their customers who provide power back to the grid from solar panels. I based my decision on the current rates and just signed an agreement last week. If I do not receive the cost benefit I will need to alter my plans and not install the solar panels.

Can someone please inform me if this is true? If RMP makes a change how will that affect me? Is there a grandfather clause for those who install solar panels before the end of the year?

I oppose any change and would like to be provided a response.

Thanks,

**Gary Horton**  
gh.triton@gmail.com  
801-879-8134



PublicService Commission &lt;psc@utah.gov&gt;

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**Public comment (Docket No. 17-035-61)**

1 message

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**Gary Beckstrand** <gbeckstrand@gmail.com>

Mon, Oct 5, 2020 at 5:19 PM

To: psc@utah.gov

The purpose of this email is to ask you to reject RMP's proposal to implement a lower rate structure for net metering in Utah. I've lived in Utah for the past 28 years and finally took the step this year to invest in solar panels for my home. One of the major factors was the affordability based on assumptions regarding current net metering rates which still provide a win-win for folks like me and RMP.

Increasing the rate will discourage if not essentially eliminate others from installing solar which undermines the value to the state of encouraging the expansion of renewable energy. We need to do everything we can to promote renewable energy rather than limit options by keeping so much authority and control with RMP. I have not had any complaints or concerns with RMP previously but feel it is obvious that they are acting in their best interest at the detriment to current and future solar customers.

I also fear that the proposed reduced rates would severely damage the overall industry and providers in Utah making it difficult for companies to honor their warranties and service agreements if the industry becomes less viable in Utah and resources are reallocated to adjacent states with more favorable support and incentives.

Thanks for considering my request and helping keep solar options affordable to provide both personal and environmental benefits to me and other solar customers in our great state!

Gary Beckstrand  
249 E 1825 N  
Centerville UT, 84014  
801-403-9128