



PublicService Commission <psc@utah.gov>

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## Public Comment Docket No: 17-035-61

1 message

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**andyparadis@yahoo.com** <andyparadis@yahoo.com>

Wed, Oct 14, 2020 at 9:11 PM

To: psc@utah.gov

To whom it may concern,

Rocky Mountain Power's proposal to cut export rates effectively values a Kwh distributed to customers at only 1.5 cents. The stated rationale for the rate cut is that Rocky Mountain Power is able to obtain power at far lower rates from commercial solar farms. If this is correct, they are currently significantly overcharging all customers, including those to do not generate solar power. Depending on the rate tier most customers pay 8.8 cents per Kwh or more which is about 6 times higher the proposed 1.5 cents per Kwh. Rocky Mountain Power is entitled to profit but a 6 fold markup is unreasonable.

Additionally, Rocky Mountain Power ignores the environmental benefits of solar production. Many populated areas of Utah are plagued by poor air quality and more solar could help improve the air by for example, powering more electric cars.

Thanks,

Andrew Paradis

801-703-5530



PublicService Commission <psc@utah.gov>

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## Rooftop Solar Docket 17-035-61

1 message

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**Leland Myers** <lelandmyers@gmail.com>

Wed, Oct 14, 2020 at 9:53 PM

To: psc@utah.gov

Hello,

Please accept my comments on the proposed rate change paying solar panel owners for excess power. In my opinion, rooftop solar should stand on their own merit and not be subsidised by other ratepayers. Please stop the subsidy on new installations.

Thank you.

Leland Myers  
Salt Lake City

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Leland Myers  
801-560-3938



## Rocky Mountain Power and Tariffs

1 message

Zac <iggylover@gmail.com>

Thu, Oct 15, 2020 at 9:12 AM

To: psc@utah.gov

To my legislators and the regulatory committees:

I oppose the proposals to allow Rocky Mountain Power (RMP) to change energy buyback tariff rates from \$0.092 to \$0.015. I think a rate more in the area of \$0.08-0.085 is the only fair option. Home solar is an EXCELLENT way to promote green energy while not getting sucked into the black hole of "Green New Deal" ideology and costs eventually subsidized by the taxpayer.

My biggest argument is that RMP just wants to keep growing, and home solar makes that slower. Sorry, that's business. They have a monopoly and it's being maintained by our government. I'd even be unsurprised to see the FTC step in, or even the Utah Supreme Court. Below are my itemized rebuttals.

Background: I'm the CTO for Inergy Solar, a renewables technology company which DOES NOT currently offer any rooftop/whole-home renewable generation. We design portable generators for smaller use cases, incapable of connecting to a utility. Therefore, my job does not create a conflict of interest (unlike RMP). Furthermore, I worked for VIA Motors, a hybrid/electric vehicle designer and manufacturer for several years prior as lead EE. My main experience is battery and inverter technology.

1. This is, first and foremost, an effort to maintain a profitable monopoly by RMP. I consider this in violation of FTC antitrust laws. There is no competition to RMP aside from home/business local power generation. Allowing these changes conflicts with core principals of our free-market spirit, policies, and even laws. While I agree that RMP should be able to find ways to remain profitable, this is an effort to crowd-out their competition: residents and businesses with small solar installations.

2. RMP should not be able to force rates of payment to customers that differ from the rates they would pay other large solar farms and businesses. Residential customers are incapable of financing, let alone providing the physical space requirements, for large installations. Setting minimum system sizes for fair compensation is unfair and gating to the average residential buyer. I can agree, however, that the maximum reimbursement (tariff) rate could be no more than the cost customers would have paid per kWh.

3. This reimbursement/tariff is only a reduction in utility costs for a customer. While separately I'd argue that the utility should be required, at the end of the fiscal year perhaps, to pay-out any excess accumulated credit, for this argument I'd say they at least owe customers even reductions to their bills commensurate to their contribution. RMP claims they are losing money by doing this. I agree only if you consider a penny not made is a penny lost. RMP would prefer to build its own renewable energy infrastructure and charge residents more for it (\$2/mo in addition to your usage).

4. I am NOT a "Green New Deal" proponent. One of the best ways to invest in renewable infrastructure is to let the community do it themselves. RMP's renewable program costs users extra, with the only payoff being a feel-good-attitude. When residents invest in their own renewable generation, they eventually enjoy the payoff of less/zero utility costs. No such payoff will ever be part of the RMP renewable program. You just have to pay more to "feel good."

Forcing utilities to expand renewable sources is unsustainable. California is an excellent example. However, incentivizing residents to invest in their own is a great solution. They don't take up new land, they use existing rooftop space (a major waste of solar real estate if shuttered/deincentivized).

5. Continuing my reasons why individual investment is better than utility investment in infrastructure:

- a. Customers subsidize their own install costs
- b. Power generated is cleaner and more efficient than utility power. No transmission losses, smooth inverter power (see my next point, 6).
- c. No maintenance costs. RMP need only maintain the power line between a generating house and a non-generating house. No generators, no turbines, no crew, only existing inspections and line maintenance.
- d. Solar farms are giant, costly to build and maintain, eyesores, and no more efficient than small-scale he systems (no more than perhaps 1-2%).
- e. Home solar gives owners off-grid capabilities (with added batteries). Investing in utility infrastructure does not.

f. No operating costs to the utility. They only reduce customer bill amounts.

6. During my time at VIA, I worked directly with Southern California Edison (SCE) and LA AIRFORCE Base to participate in a study (with other participants such as Nissan) in which electric vehicles were used to export stored battery power to the grid (in the same manner as solar installations). This energy was purchased by the utility, as it smoothed out their power and offset local demand. Inverter-generated power, when meeting regulatory standards set forth by UL1741, is favorable to nominal grid power. It can maintain grid frequency and smooth droops and brown-outs.

7. Solar farms only produce in the daytime. Adding massive battery storage banks is costly, and must be entirely replaced every 5-10 years. Home users can add battery banks at much lower cost, and with a minimum of 10 years' service life (which can continue at reduced capacity). Again, the costs are left to the resident, and chosen by them instead of taxed (like California) or billed forcibly by a utility through rates.

8. Solar is not a good form of renewable energy at the utility scale. The only sustainable model I see is incentivizing residents to invest and use their existing rooftop space and power infrastructure. According to Google's "Project Sunroof", Utah rooftop space is able to vastly out-produce RMP's proposed renewable generation capacity (which is in 2035). Aggregate rooftop generation potential in Utah is 11GW (11K MW) of solar energy. While the market may never grow to that on its own, adding incentives (tax rebates, net metering) prompt it to. RMP only plans to produce 7GW.  
<https://www.google.com/get/sunroof/data-explorer/place/ChIJzfkTj8drTlcRP0bXbKVK370/>

9. If RMP wants to invest in solar farms, they should start by investing in making use of all the available rooftop space. Why not incentivize residents to do it for them? No infrastructure costs, no install, no maintenance. They don't even have to make cash payments, only credit towards billing.

I have more reasons, but this is getting lengthy, so I will conclude with this: RMP is not expected to lose money under fair considerations. But what the residents cannot be expected to do is sell their generated power back at an unfair rate! I would be in favor of a SMALL reduction in tariff rates, to account for local grid maintenance costs (poles, transformers, etc.). However, RMP is subsidizing its own growth with its monopoly and even requiring residents to pay higher rates for renewable growth for zero equity, and the egregious part is that The Great State of Utah is allowing it. I urge lawmakers and regulators to stand against this, and accept only data-driven cost analysis which show that the fair costs of local maintenance are covered, while energy is reimbursed at fair rates to residents. For a state which suffers greatly with air quality, I am sad to see such action being taken by RMP and, potentially, appalled at the legislative representatives' actions.

Please reconsider the rate changes. As RMP is not making any cash payments to users for their energy production, RMP cannot claim that any losses are the customers' responsibility. Their own over-growth and corporate inefficiencies drive the losses, and it's the way of the free market for them to overcome that. Perhaps by offering customers subsidies to install solar instead of making us pay more for it, they could realize their goals, while making use of rooftop space and resident investment. I think there's a way this works out better for everyone, and letting RMP call the shots is not it.

Sincerely,  
Zachary D. Blume

Orem, Utah Resident