

October 28, 2020

Utah Public Service Commission
P.O. Box 4558
Salt Lake City, UT 84114-4558

UTAH PUBLIC
SERVICE COMMISSION

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RECEIVED

Thad LeVar, Commission Chair
David Clark, Commissioner
Ron Allen, Commissioner

Dear Commissioners,

We are writing to strongly urge you not to grant Rocky Mountain Power's decrease in rooftop solar power credit. Renewable sources of energy are our only choice for clean power in the near and distant future. Rocky Mountain Power's move for a reduction will not only discourage current and potential rooftop solar support, it will kill the future of rooftop solar power in Utah.

There are several reasons why allowing net metering from residential solar systems is in the best financial interest of power companies. Three prominent ones are:

1. The annual peak in electricity needs occurs during the summer at peak air conditioning usage. If power creation and power line distribution are sized to accommodate this seasonal peak the cost is significantly higher to the power companies than if they utilize net metering to solar customers whose peak offset to power needs occurs precisely at this time. Without the contribution from home solar, the power companies have to continually rework transmission lines and either add power generation capacity locally or buy it from elsewhere to meet the continually increasing urban in-fill building and the peak summer air conditioning demand.

Power companies will benefit financially if their output needs are relatively consistent.

2. In the very near future home solar installations will have the option of either net metering or in-situ battery storage installations. If the latter course of action is the only one available, the home owners will be able essentially to separate from the power grid. If net metering is available, the home solar producers will remain viable customers during all periods and reduce the peaks in power needs.

Power companies will benefit financially if the customer base is not reduced.

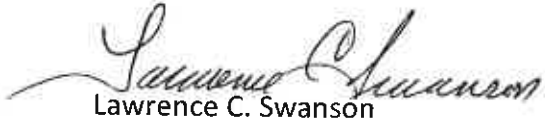
3. At the present time and in the future State governments are and will be enacting regulations concerning the percentage of power generated by renewable resources. Thirty states already have rules in place and these will multiply fairly rapidly in the

future. Some already have targets of 50% or more of power generation to be from renewable sources. Power companies can utilize the participation in net metering programs as a means of complying with these current and emerging regulations.

Power companies will benefit financially if their customers can help them meet regulations on sources of energy.

We strongly encourage you, do not allow this move on the part of Rocky Mountain Power.

Sincerely,



Lawrence C. Swanson



Dr. Sharyl G. Smith

427 South 1200 East
Salt Lake City, UT 84102



PublicService Commission <psc@utah.gov>

public comments for 17-035-61

1 message

Kevin Colarusso <kevin@elansolar.com>

Sat, Oct 31, 2020 at 2:50 AM

To: psc@utah.gov

Shame on the PSC!

"This agency, which regulates prices and practices at most of the state's electric, natural gas, water, etc has been caught favoring and colluding with electric and gas companies repeatedly. Many see its rate-setting proceedings as charades akin to a Japanese kabuki dance that features lots of activity, but a predetermined outcome." (article referencing California's Public Utility Commission). This statement hits too close to home today for too many Utah residents since Utah's very own Public Service Commission seems to be joining the long list of states throughout our country that disregard public testimony and serve the interests of utility companies more than its public. The large majority of testimony by the public was not in favor of an adverse change to the customer generated export credit. The rare public testimony that supported change was mostly employees of Utah utility companies.

Sadly, it appears that Utah's PSC had already determined a rate before the hearings even began. Per the Commission's order announced this afternoon (October 30, 2020), "Our regulatory purview does NOT include any and all considerations of interest to the public." It begs the question...what is the purpose of a "Public Service" Commission that leans more towards reinstating the monopolization of electricity compared to seeking options and competition for the public by protecting a free-market economy?

Utah's Commission Isn't Concerned About It's Public

Late this afternoon (Friday on Halloween Weekend) is when the new order was posted on the PSC website. Today, the same day we are learning about the new schedule, the Commission announced the expiration of the old schedule effective immediately! This is compared to 2017 that was filed October 24, 2017 and Effective November 15, 2017. Without warning many residents who have recently decided to go solar are now in a lurch and subject to terms of a new schedule that they didn't sign up for. No time for Utah solar companies to digest the new schedule and fulfill on their promises to customers let alone understand the new schedule to articulate to new solar households/businesses going forward. This is by design and completely selfish on the part of the Commission and without regard to its public.

Shame on the Public Service Commission for letting down your public. We believed Utah to be different, that the Commission would rise up and protect our right to choice. This is a nationwide problem; Net metering is under attack by utility companies and the "Public Service" Commission. It's a strange problem to face; utility monopolies protected by the Public Service Commission.

Sincerely,

Kevin

**Kevin Colarusso**

CEO

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PublicService Commission <psc@utah.gov>

Utah Public Service Commission - Home Solar Credit

1 message

Raoul Nelson <raouldnelson@gmail.com>

Sat, Oct 31, 2020 at 7:10 AM

To: psc@utah.gov

I am appalled at your decision. This is a regressive decision. Pacific Power is a public utility that has a monopoly and has not upgraded the technology of local grids for years. They are stuck in the model of centrally distributed power with huge losses of energy due to inefficient transmission at great distances. They should be required to serve the public with a long term objective of providing power in an environmentally sound manner. There should be more incentives for decentralized power generation. I object to your decision. I would like to see the facts and figures provided in more transparent manner. I see this as corporate welfare.

Raoul D Nelson
Resident Cottonwood Heights



PublicService Commission <psc@utah.gov>

(no subject)

1 message

Jeffrey Dunn <jeffrey.t.dunn@gmail.com>
To: "psc@utah.gov" <psc@utah.gov>

Sat, Oct 31, 2020 at 9:10 AM

Public service commission,

In an era of climate crisis your decision to reduce solar energy credits is crippling to a developing industry and devastating to new commercial development.

Please reconsider your decision.

Regard,
Jeff Dunn



PublicService Commission <psc@utah.gov>

Please

1 message

Nicholas Alleman <nicholasinutah@gmail.com>
To: psc@utah.gov

Sat, Oct 31, 2020 at 10:06 AM

The Utah Public Service Commission agreed Friday to let Rocky Mountain Power reduce the amount of energy credits that people receive in exchange for solar power to a level making them worthless ...

The west and frankly the planet is burning up. And this is what you do? This is immoral! You will be judged harshly.

" The commissioners wrote that it isn't their job to regulate environmental or public health issues."

"the **Commission** is to ensure safe, reliable, adequate, and reasonably priced **utility service**."

How can you provide safe and reliable utility when RMP has to shut down power because the west is burning with extreme fire danger.

This reasoning does not add up. It is unconscionable. Please reconsider.

Concerned citizen,

--

Nicholas Alleman
85 Saint Moritz Terrace
Park City, Utah 84098-5241
801 512-1871



PublicService Commission <psc@utah.gov>

Docket No. 17-035-61

1 message

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

Sat, Oct 31, 2020 at 2:45 PM

Thad LeVar, David Clark and Ron Allen:

I'm not here to complain about the net metering change (although I'm very disappointed in your decision). **I would like to express how devastating that you decided to make the change effective immediately.**

As the CEO of Smart Wave Solar. Utah is the only market we are in. We'll install about 85 residential solar systems this month. We weren't told when the announcement would be made (just that it would be sometime before the end of the year). We weren't told when the changes would take effect. Everyone I've talked to in the solar industry assumed the changes wouldn't take place until at least Jan 1st, 2021.

How are we supposed to run a business when a decision like this takes immediate effect and creates such whiplash? As of last night, Rocky Mountain Power stopped accepting net metering applications on the 9.2 cent program. Just like that. We've invested a tremendous amount of marketing dollars and time and energy on getting customers to purchase solar recently, site surveys, engineering letters, CAD designs, permit applications, payroll, etc.

A solar company (or solar customer) can't just submit a net metering application the instant a customer signs a solar agreement. A site survey has to be done, pictures need to be taken, a CAD design needs to be created, and you need to get the customer's utility account number. So now we have customers who signed an agreement recently hoping to get in on the 9.2 cent program before it changed, and now they can't. Those consumers have been blindsided and our company has been blindsided by this "immediately" implementation of a new policy. That is not right. You should have given solar companies and consumers at least a little time to receive the news before it took effect.

I'm confident we will have a lot of solar contracts get cancelled now. This will likely cost us about \$250,000 in revenue from signed contracts we already have in hand. We've also spent about \$60,000 on print advertising campaigns for November that can't be cancelled.

Our sales team had dozens of proposals out. The last day of the month is always our biggest for sales (since we have promotions ending the last day of the month). We usually sell \$300,000 in solar on the last day of the month (which should be today). But instead of signing a bunch of solar deals today, our sales team has been thrown into a tailspin trying to figure this out.

Blindsided by your timing. This is horrible.

Reducing net metering is a punch to the gut for the solar industry in Utah, but if you feel you had to make that decision, then it is what it is. But there is no justification for the change to take effect immediately. That is like kicking us while we're down.

I beg of you to please reconsider and extend the schedule 136 (9.2 cent net metering) through the end of 2020 to give solar companies and consumers at least a few months to scramble and adjust. At least let us submit the net metering applications for all the contracts we signed prior to yesterday. This is insane.

It's bad enough to have to deal with the change going forward. It's a whole other thing to have contracts cancelling that we signed over the last few weeks.

Sincerely,

Ryan Stucki - CEO
Smart Wave Solar
668 W 14600 S #200
Bluffdale, UT 84065
801-803-8676 (mobile)