

November 12, 2020

Dear Commissioners,

As a previous solar power producer, we are very familiar with the many benefits solar brings to our community, the climate, and our grid. We first installed solar on our previous home in Salt Lake City, Utah, in 2014 under rate schedule 135. The net-metering program under schedule 135 was a significant financial incentive and helped reduce our overall investment costs in solar. My family wanted to go solar because we wanted to have an impact on air quality in Salt Lake City and reduce our community's dependence on fossil fuels. In addition to a residential solar system, we also invested significant funds to make our home as energy-efficient as possible. My family also converted many of our gasoline-requiring devices to electric power including our car, lawn mower, and other lawn maintenance tools.

Now we have the opportunity to go solar again on our new home that is currently under construction in Hideout, Utah. Based on recent maps provided by Rocky Mountain Power, we know that our home is in an area that could be disconnected from the grid if there were to be a wildfire nearby. We therefore plan to include backup battery power with our solar system so that we do not lose power in our home should we be disconnected from the grid. From previous experience we knew that getting approval from our HOA, as well as all our permits and paperwork in line was important, as was finding the right contractor and picking the right materials. All of this has taken us close to a year, but we knew this work was worth it and our previous experience told us that we would receive fair compensation for the valuable energy we were going to provide to my neighbors and community.

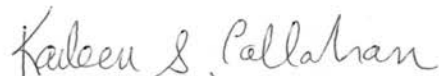
By implementing a new rate schedule with no advance notice we did not have time to change our carefully thought out plans. We understand that rates can and may change, however giving proper notice to families who are making a huge personal investment is just good practice and fair to those families. We are currently at an early stage of construction, and working through the process of designing the solar system with our builder and the solar contractor. As you may know, getting HOA approval, permits, and other approvals was a big step and we thought we were in the homestretch on this aspect of the project.

Myself, my family, and my solar installer were all expecting to submit our solar system under the Transitional Customer Generation rate schedule 136, but we were unable to meet the abrupt deadline. We hope you consider the substantial investment our family is making in our community's clean air and local resilience, and extend the deadline for rate schedule 136 to January 1, 2021.

Respectfully,



Donald K. Blumenthal II, PhD



Karleen S. Callahan, PhD



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>

Thu, Nov 12, 2020 at 11:59 AM

Thad LeVar, David Clark and Ron Allen:

A quick update on this. After doing a full review, Smart Wave Solar has even more solar projects in jeopardy than I realized in my original email below. There are a total of 19 solar contracts that our company signed on or before October 30, 2020, but were unable to get net metering applications submitted before Rocky Mountain Power stopped accepting applications for schedule 136. **The total contract value of these 19 projects is \$485,653.** For some solar companies that might not be a lot of money, but for us, a local company who only operates in Utah, this is massive.

We are really, really hoping that you are going to allow these customers an extension to get in on the previous net metering program (schedule 136). There is still a lot of capacity from what was originally allocated for schedule 136 as shown on Rocky Mountain Power's website. What would it hurt to allow applications through 12/31 for schedule 136? That's what everyone in the solar industry was expecting.

These customers were aware a change was potentially coming in 2021 to net metering, and they wanted to make sure they got in before that, which is why they signed up when they did. We were all blindsided by your announcement taking effect immediately. These customers will be extremely disappointed if they can't get on schedule 137 and many have already expressed that they want to cancel if we can't get an extension.

We cannot afford to lose \$485,653 in revenue retroactively. Even losing a portion of that would be devastating. This is money we need for payroll. This is money we need for overhead. Our sales people are sick that they might lose their hard earned commissions on these deals.

In the meantime we've asked the customers for these 19 projects (along with our employees) to not panic, since we've been talking with Vote Solar (and others) about a potential extension. We've asked our customers to hold off on cancelling their contracts until we get a decision on that.

The other challenge is that these customers want to make sure they get installed before 12/31 to make sure they get the 26% federal tax credit instead of the 22% that takes effect 1/31/2021. To make that happen, we need permits, and there's no time to wait since blueprints, engineering letters, and permitting takes time (some cities take 6+ weeks to get us a permit). As a result, we've told these customers that we're going to continue moving forward with their permitting, which is literally costing us tens of thousands of dollars.

If you let these customers in on schedule 136, we'll have permits ready. If you don't approve the extension, we'll not only have a bunch of cancellations and lost revenue, but we'll have wasted a lot of time on money on permits as well. We can't wait to submit the permits. We are a company who takes care of our customers, so we're hanging out neck out here on this.

We've let all these customers know that if an extension is not approved, we will let them cancel their contracts without penalty, and we will provide them with full refunds. We care about our customers, and wouldn't feel right holding them to a contract.

This has put us in a terrible bind.

Please extend the application deadline for schedule 136 so these customers can get in.

Here's a list of the projects in this position. All of them have signed contracts from 10/30 or prior.

| Customer                         | Street Address                  | City            | Zip   | Sales Consultant | Appointment Setter | Agreement Amount |
|----------------------------------|---------------------------------|-----------------|-------|------------------|--------------------|------------------|
| Benjamin Torres                  | 602 Country Club Dr             | Stansbury Park  | 84074 | Steven           | Chelsea            | \$24,552         |
| Eric Thompson                    | 1233 N 400 W                    | American Fork   | 84003 | Jake             | Jake               | \$32,194         |
| Levi & Leanne Sheffield          | 975 N 340 West                  | Tooele          | 84074 | Bryant           | Sam                | \$21,951         |
| Juan & Mericel Rodriguez         | 9646 North Canyon Heights Drive | Cedar Hills     | 84062 | Randy            | Sam                | \$27,191         |
| Denise Whitney                   | 715 Lindon Drive                | Brigham City    | 84302 | Celia            | Celia              | \$23,803         |
| Dale Densley                     | 575 West 1600 South             | Mapleton        | 84096 | Cameron          | Gary               | \$38,765         |
| Stewart and Ali Lay              | 5994 S Susquehanna Drive        | Murray          | 84123 | Bryant           | Sam                | \$18,783         |
| Angela Justin Rohr               | 723 W 2025 N                    | Centerville     | 84014 | Jake             | Sam                | \$28,182         |
| Maren & Eric Jensen              | 15604 Packsaddle Drive          | Bluffdale       | 84065 | Jake             | Sam                | \$54,474         |
| Brian & Matthew Scholle          | 8430 South 115 East             | Sandy           | 84070 | Randy            | Chelsea            | \$13,017         |
| Brian & Pearl Scholle            | 134 East Pioneer Av             | Sandy           | 84070 | Randy            | Chelsea            | \$13,017         |
| Susan Saltzman                   | 285 S 160 E                     | Ivins           | 84738 | Randy            | Chelsea            | \$20,158         |
| Will Fountain                    | 14759 S White Ridge Cove        | Herriman        | 84096 | Curtis           | Sam                | \$28,149         |
| Elnora & Peter Ferrero           | 716 W Bullion St                | Salt Lake City  | 84123 | Jake             | Chelsea            | \$34,148         |
| Alan Arbuckle                    | 475 East 1000 South             | Centerville     | 84014 | Celia            | Celia              | \$17,780         |
| Terry & Scott Carlson            | 1178 Eaglewood Loop             | North Salt Lake | 84054 | Celia            | Sam                | \$17,610         |
| Sean Carpenter                   | 4771 Home Run Alley             | Erda            | 84074 | Mike             | Chelsea            | \$36,546         |
| Kristina Nieto & Brandon Deering | 5564 West Deerbrush Circle      | West Jordan     | 84081 | Mike             | Chelsea            | \$16,154         |
| Jarrold & Kayla Chavez Rhea      | 2002 Pierce Avenue              | Ogden           | 84401 | Bryant           | Sam                | \$19,179         |

Ryan Stucki - CEO**Smart Wave Solar**

668 W 14600 S #200

Bluffdale, UT 84065

801-803-8676 (mobile)

On Sat, Oct 31, 2020 at 2:45 PM Ryan Stucki <[ryan@smartwavesolar.com](mailto:ryan@smartwavesolar.com)> wrote:

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**  
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[www.imwindandsolar.com](http://www.imwindandsolar.com)

Dear Commissioners,

As a Utah business owner in the solar industry I am writing to ask you to consider extending the Transition Rate until January 1, 2021 to help us keep our business going while we figure out what the changes mean to the market and the financial impact to those customers who want to go forward with solar under the new tariff. I understand and respect the process in determining the value of solar to Rocky Mountain Power, but I am asking you to please reconsider the October 30 hard stop to the Transition Rate.

Just looking at our own records, Intermountain Wind & Solar has thousands of customers who have taken concrete action to go solar under the old rates. We have been in business for 12 years and have a strong reputation for informing our clients on what solar is and isn't so they can make the best decision for them. This sudden change means that customers we told would get one value for solar and having the rug ripped out from under them in the middle of the process.

We never want to misrepresent the value proposition of solar, which is strong and helps create local jobs, keep our air clean and provide savings for Utahns. I am asking that you include customers who are in the process of going solar in the legacy rates to protect the good name of our business and reputation of solar in Utah.

Sincerely,

A handwritten signature in black ink, appearing to read "D Shipley".

Doug Shipley

CEO/Founder



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

**17-035-61**

1 message

**Janine Luke** <chargersfan1965@gmail.com>  
To: psc@utah.gov

Thu, Nov 12, 2020 at 6:21 AM

My name is Janine Luke and your actions to change the compensation rate for solar on October 30th will really hurt my family. My husband Mack and I bought our home in Kearns four years ago, and we really love it. Mack does maintenance work for Intermountain Healthcare, and I work at a drapery company.

Since buying our home we've done a lot of work on it to help reduce our electricity bill, and make it more comfortable for ourselves and my 80-year-old mother. We've gotten a new furnace, fixed the siding, and just recently installed new windows. Installing solar panels was our next improvement. We did everything right. We went through the process of getting financing, applying for a permit, getting our roof inspected, all of it. But because our permit wasn't accepted by the Kearns township until November 2nd, we missed the October 31st deadline. After all of that time, money, and effort, the benefit from this system was cut in half. We simply can't afford this, and I can't imagine anyone else will be able to either.

Before this change, my husband and I had it all mapped out. We're looking forward to retiring soon and we were planning to pay off our mortgage, and the loan for these solar panels at the same time. With this unexpected and last minute change, however, I don't know what our future looks like anymore.

I've never written into a public commission before - this isn't the kind of thing I like doing. But this change will hurt my family, and many others too. I'm writing in to ask you to stop this change, or at least extend the start date so that people like me aren't left stuck in the middle of these bureaucratic changes. More people should be able to choose to put solar panels on their rooftops. Please fix this.

Janine Luke  
Kearns, Utah

Sent from my iPhone



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

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**Comment to extend solar rate Docket No. 17-035-61**

1 message

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**David Drury** <ddrury@talltreehealth.com>  
To: "psc@utah.gov" <psc@utah.gov>

Thu, Nov 12, 2020 at 1:11 PM

November 12, 2020

Dear Commissioners,

After 20 years of moving all over the country and the world with the U.S. Army, I am proud to have called Sandy, UT home for the past 26 years. My wife and I have been in our house for 22 of those years, and we are currently in the process of investing in a new roof and solar array. I am concerned about the recent PSC decision to immediately end the current compensation rate for rooftop solar customers.

Going solar is the right thing to do. It helps reduce pollution and protect the natural beauty that I love about Utah. So, why is Rocky Mountain Power trying to discourage Utahns from going solar? The electricity solar customers send to the grid is the same as what the utility provides, so it makes sense that the rate we pay would be the rate we receive in return for our excess power.

It also makes sense that when the PSC announces huge changes to customer rates that they allow an appropriate amount of time for customers to react. It has taken a considerable amount of time and consideration for us to make the decision to go solar, so an overnight decision just doesn't seem right.

My family has already gone through the process of getting the required loan and signing a contract with an installer. We have the plans for our system, which will help us offset 80% of our electricity consumption, and we are expecting to finish the work by the end of the year.

I urge the Commission to consider the difficult circumstance they are imposing on Utahns like me who have carefully planned their investment in our collective energy system. Please extend the deadline for the Transition Rate to January 1, 2021.

Thank you,

David Drury

(801) 918-7719



PublicService Commission <psc@utah.gov>

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## Docket No. 17-035-61

1 message

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**Alan Arbuckle** <awarbuckle@yahoo.com>  
To: "psc@utah.gov" <psc@utah.gov>

Thu, Nov 12, 2020 at 2:12 PM

Public service commission,

I have signed up to have solar panels installed on my roof several weeks ago with out the knowledge of the change in the rates and metering modification. I did so to help conserve energy and protect the environment. With this in mind it made sense because of the incentives of the old rate and net metering from Rocky Mountain power(RMP). The new changes discourages conservation and installing solar panels. If enough solar panels are installed it can help reduce the amount RMP needs to generate or reduce the number of power plants they will be required to build to meet the demand of power.

I will be ready for the panels to be installed within 30 days and I would like to be grandfathered in to the old rate and net metering terms RMP has with current solar customers. If this is not granted it will discourage me and I am sure hundreds of others from installing solar panels. Please reconsider and grant those that have signed up and are ready to install the solar panels grandfathering us in.

Sincerely,

Alan & Karlynn Arbuckle