

USEA - Solar Industry
10 West 100 South, Suite 323
Salt Lake City, Utah 84101

March 5, 2021

Chair Thad Levar
Commissioner David Clark
Commissioner Ron Allen
Heber M. Wells Building, 4th Floor
160 East 300 South Salt Lake City, UT 84114

Re: Rehearing in Docket No. 17-035-61

Dear Commissioners,

The Utah Solar Energy Association (“USEA”) and the rooftop solar industry are writing to oppose the position Rocky Mountain Power (“RMP”) proposed for rehearing in Docket No. 17-035-61 (“Docket”) to calculate the capacity contribution for the export credit rate the Commission set in its October 30, 2020 order (“Order”). As you know, USEA is a party in this Docket, but it has not participated in the Rehearing because it appeared from early filings that any rate adjustment would be minor, and it did not have resources to continue. In addition, Ryan Evans, USEA’s former president, moved out of state and the Association appointed Steve Mecham as its interim director. Consequently, we just became aware of RMP’s position and must oppose it because it would further cripple the rooftop solar industry.

When the Commission granted rehearing, USEA believed parties would propose relatively minor calculation corrections that might alter the Commission’s export credit rate tenths of a percent up or down. After reviewing testimony for the Rehearing, it appears RMP is proposing a new method for determining contribution capacity, not just a simple calculation change. What’s more, RMP has already introduced this proposal in rebuttal testimony and at the hearing, and the Commission rejected it.

If we understand it correctly, RMP’s proposal would slash the export rate an additional 41 - 43 percent from 5.6 - 5.9 cents per kilowatt-hour the Commission set in its Order to 3.2 - 3.5 cents, a pummeling the industry could not endure. Terminating the Net Metering program in 2017 and reducing the rate from one-for-one net metering to 9.2 cents was a blow to the industry. The Commission’s Order last year cutting the rate 40 percent to one of the lowest in the nation at 5.6 - 5.9 cents and requiring an annual review sent the industry reeling. RMP’s proposal in Rehearing could be the death knell of the rooftop solar industry and eliminate a competitive choice in the market.

Over the past year, approximately one-third of the solar companies in Utah have been forced to close their doors. Of those that remain, business has declined dramatically. It is becoming much more difficult for the industry to offer Utah customers affordable options for solar energy. USEA recognizes the Commission does not believe it has jurisdiction to consider impact on economic development, air quality, or the other public interest value of solar energy, but disregarding them has damaged the industry and the state.

USEA and the rooftop solar industry strongly urge the Commission to reject RMP’s proposed new method for determining capacity contribution. That method artificially deflates the capacity value that the Commission has already recognized rooftop solar provides and will not fairly reflect the costs and benefits of rooftop solar. Additionally, the result will not be just, reasonable, or in the public interest.

Sincerely,

/s/

USEA
Creative Energies
DSD Renewables
Gardner Energy
Go Solar Group
Intermountain Wind and Solar
Smart Wave Solar
Sunus Solar
Synergy Power, Inc.
Wheeler Machinery Co.
Yellow Bear Energy

Contact Steve Mecham 385 222-1618

cc: Governor Spencer J. Cox
spencercox@utah.gov
jonpierpont@utah.gov

Margaret Busse
Executive Director, Department of Commerce
mbusse@utah.gov

Thom Carter
Executive Director, Governor's Office of Energy Development
thomcarter@utah.gov

CERTIFICATE OF SERVICE

I hereby certify that on March 5, 2021 a true and correct copy of USEA's and the Solar Industry's letter to the Commission for the Rehearing in Docket No. 17-035-61 was served by email on the following Parties:

Division of Public Utilities

Chris Parker
William Powell
Justin Jetter
Patricia Schmid
DPU

chrisparker@utah.gov
wpowell@utah.gov
jjetter@agutah.gov
pschmid@agutah.gov
dpudatarequest@utah.gov

Office of Consumer Services

Michele Beck
Cheryl Murray
Robert Moore

mbeck@utah.gov
cmurray@utah.gov
rmoore@agutah.gov

Rocky Mountain Power

Rocky Mountain Power Data Request Response Center
Jana Saba

Emily Wegener

datarequest@pacificorp.com
jana.saba@pacificorp.com
utahdockets@pacificorp.com
emily.wegener@pacificorp.com

Vote Solar

Sachu Constantine
Jennifer Selendy
Joshua S. Margolin
Philippe Z. Selendy

sachu@votesolar.org
jselendy@selendygay.com
jmargolin@selendygay.com
selendygay.com

Utah Clean Energy

Sarah Wright
Kate Bowman
Hunter Holman

sarah@utahcleanenergy.org
kate@utahcleanenergy.org
hunter@utahcleanenergy.org

Salt Lake City Corporation

Christopher Thomas

christopher.thomas@slcgov.com

Western Resource Advocates

Sophie Hayes
Nancy Kelly
Steven S. Michel

sophie.hayes@westernresources.org
nkelly@westernresources.org
smichel@westernresources.org

HealUtah

Noah Miterko

noah@healutah.org

/s/ Stephen F. Meham