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July 3, 2023

Mr. Thad LeVar
Mr. David Clark
Mr. John S. Harvey
Public Service Commission of Utah
160 East 300 South, 4th Floor
Salt Lake City, UT 84111

PUBLIC SERVICE COMMISS

'23JUL6 10:41

RECEIVED

Re: Rocky Mountain Power (“RMP”)—Residential Solar Net Metering

Gentlemen:

Last year we decided to contribute to our community and world by installing solar panels on our roof. We expected that we would zero out our electricity consumption and pay for the benefit by reducing our electric bill to the base monthly charge.

Per our attached most recent bill from Rocky Mountain Power (“RMP”), we met our first goal: Generating more electricity than we are using. However, because of a surprise (to us) in the UPSC approved rate structure and its application by RMP, we are paying for electricity that we are not using. This is both inconsistent with RMP’s description of net metering, as well as its commission to encourage the use of alternative sources of energy.

In summary, the attached bill reflects:

Electricity used (Block 1):	400 kwh @ 0.0798930 = \$31.96
Electricity used (Block 2):	<u>43 kwh @ 0.1037250 = 4.46</u>
Total Charged by RMP:	<u>443 kwh</u> \$36.42

Solar Electricity Generated by us:	<u>472 kwh @ 0.05636</u> = (22.40) Credited by RMP
Net Charge for Electricity not used	<u>\$14.02</u>

Net result: Notwithstanding that we generated (and contributed back to RMP) 29 kwh’s more electricity than we consumed, we were still charged \$14.02 for power consumption PLUS the monthly basic charge of \$10.00. We understand the requirement for a monthly basic service charge (albeit larger than that charged in some other Utah communities—see attached Lehi utility bill), but the requirement to pay for electricity not consumed is patently unfair, and inconsistent with language describing net metering on RMP’s web site (see below).

Contrast this with the City of Lehi (recent utility statement attached) that credits kwh's generated by solar power hour for hour against kwh's consumed, and then carries over any excess credits to the following months' bills.

In explaining "Net Metering," the RMP web site¹ provides in relevant part (and relied upon by us): **"The net meter allows you to use the electricity you generate first, reducing what you would normally buy from your utility."** This states that kwh's generated by the customer will be applied to reduce the kwh's utilized by the customer before applying any charges—which in our case, would produce a net credit, rather than offsetting (and unequal) charges. Further, in months when our solar generation is less than the amount of electricity consumed, kwh's would be offset prior to applying RMP's rates (contrary to how RMP is handling billings currently).

Reinforcing the "offsetting" language on the same web site page, RMP states: **"For example, if you are a residential customer, you may not be home during the day when your system generates electricity. Net metering allows you to "store" this excess electricity on the grid, reducing or offsetting the electricity you would otherwise have to purchase."**

We request that:

1. You reconsider your approval granted effective March 1, 2023 for an offset rate of \$0.05636 and raise that rate to be equivalent to what RMP is charging its customers for power (since RMP is receiving a monthly basic charge for the basic hookup, there is no legitimate rationale for them to be charging a higher rate, and then crediting a lower rate for the same power); and
2. You require RMP to offset kwh for kwh for each kwh contributed to the grid by its customers **prior** to applying its kwh charges to its customers for any remaining power consumed.

If there are further steps that we should take for these requests to be seriously considered to bring fairness to the system, or if you would like to discuss this further, please let me know.

Sincerely,



Douglas F. Higham, Sr.

Attached: Rocky Mountain Power Bill for period ended May 12, 2023
Lehi City Utility Bill for period ended April 27, 2023

¹ See, for example:

https://www.rockymountainpower.net/content/dam/pcorp/documents/en/rockymountainpower/savings-energy-choices/customer-generation/RMP_NetMetering_Brochure.pdf

BILLING DATE: **May 16, 2023** ACCOUNT NUMBER: [REDACTED] DUE DATE: **Jun 8, 2023** AMOUNT DUE: **\$23.69**

ITEM 3 - ELECTRIC SERVICE

752 N Locust Ave Lindon UT
Cool Keeper 710348224 Schedule PRR

NEW CHARGES - 05/23	UNITS	COST PER UNIT	CHARGE
Cool Keeper Participant Credit for 15 day(s) (Cool Keeper Ytd Credit \$-2.90)	1 units	-6.000000	-2.90
Total New Charges			-2.90

ITEM 4 - ELECTRIC SERVICE

752 N Locust Ave Lindon UT
Net Billing -solar 5.62 Kw Schedule 137

METER NUMBER	SERVICE PERIOD		ELAPSED DAYS	METER READINGS		METER MULTIPLIER	AMOUNT USED THIS MONTH
	From	To		Previous	Current		
66863956	Apr 13, 2023	May 12, 2023	29	4150	4593	1.0	443 kwh
66863956	Apr 13, 2023	May 12, 2023	29	1473	1945	1.0	472 revkwh

Next scheduled read date: 06-13. Date may vary due to scheduling or weather.

NEW CHARGES - 05/23	UNITS	COST PER UNIT	CHARGE
Basic Charge - Single Phase (Energy To Customer Meter) (Exported Cust Generation)	443 kwh 472 kwh		10.00
Energy Charge Winter Block 1 (Beginning Credits Balance \$) (Credits Earned This Period \$22.40)	400 kwh	0.0798930	31.96
Energy Charge Winter Block 2 (Beginning Credits Balance \$) (Credits Earned This Period \$22.40)	43 kwh	0.1037250	4.46
Generation Export Credit (Ending Credits Balance \$)			-22.40
Renewable Energy Adjustment		-0.0008000	-0.03
Energy Balancing Account		0.0353000	1.29
Customer Efficiency Services		0.0384000	1.45
Usip Step Refund		-0.0072000	-0.27
Elec Vehicle Infrastructure		0.0030000	0.11
Home Electric Lifeline Program			0.16
Municipal Energy Sales/use Tax		0.0600000	1.59
Utah Sales Tax		0.0440000	1.17
Total New Charges			29.49

Net Billing Program

Thank you for choosing to participate in the Net Billing Program.
Your invoice is based on the total amount of Energy you receive from Rocky Mountain Power.
Energy that you send us from your generation facility (Exported Customer-Generated Energy) is measured by Rocky Mountain Power, and per Utah Public Service Commission approval, effective March 1, 2023, earns \$0.05636 per kilowatt-hour (kWh)

New Mailing Address or Phone?

Please print your new information below and check the box on the reverse side of this Payment Stub. Thank you.

ACCOUNT NUMBER: [REDACTED]

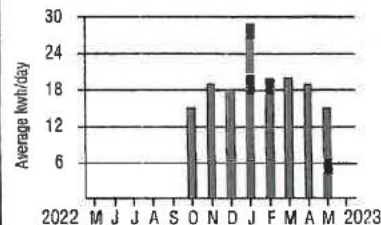
LAST _____ FIRST _____ M.I. _____

NEW STREET ADDRESS _____

CITY _____

ST _____ ZIP _____ TELEPHONE NUMBER _____

Historical Data - ITEM 4



Your Average Daily kwh Usage by Month

PERIOD ENDING	MAY 2023	MAY 2022
Avg. Daily Temp.	51	51
Total kwh	443	0
Avg. kwh per Day	15	0
Cost per Day	\$1.02	\$0.00

This product contains fiber from well-managed, independently certified forests.



Lehi City

153 N 100 E
 Lehi, UT 84043
 (385) 201-1000
 utilities@lehi-ut.gov
 Monday - Friday 8:00am - 5:00pm

[Remove Account](#)

Have your bill paid automatically each month with Xpress Bill Pay's hassle-free Auto Pay feature

Past due balances are due immediately upon receipt of your statement. Accounts with unpaid past due balances are subject to late fees and disconnection. If services are disconnected, your account must be paid in full plus an applicable reconnection fee for your services to be restored. *** Due to extreme drought conditions, please wait to water your lawns until May 1st. After May 1st, Lehi City moves to Phase III of watering restrictions, 2 days a week.***

Billing Address

[REDACTED]
 LEHI, UT 84043

Service Address

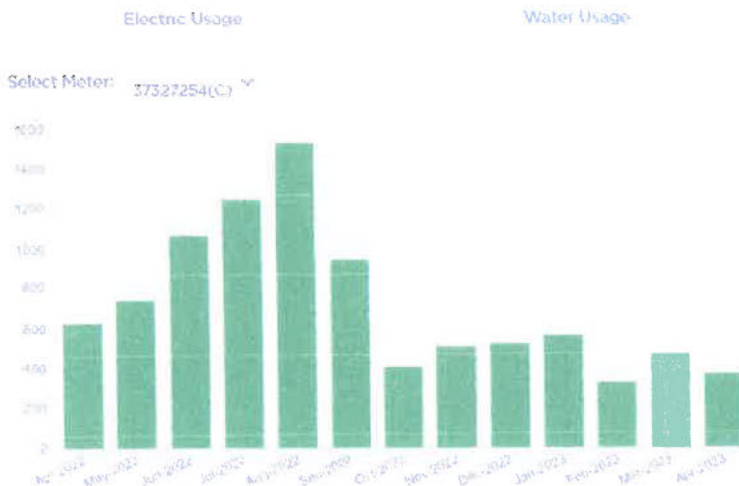
[REDACTED]
 LEHI UT 84043

Account Information

Account Number 46 [REDACTED]
 Billing Period End 04/30/2023
 Account Type Utility
 Due Date 05/25/2023
 Select Billing Period 4/30/2023

DESCRIPTION	PREV READ DATE	READ DATE	METER	PREV READING	PRESENT READING	TOTAL USAGE
Electric Usage	03/23/2023	04/27/2023	37327254(C)	22,443	22,912	369
Electric Usage	03/20/2023	04/23/2023	37327254(P)	10,000	10,703	-703
Water Usage	03/21/2023	04/20/2023	62647173	745,070	749,496	4426

Previous Payment Date 04/25/2023
 Previous Payment Amount \$94.74



Total Charges

ELECTRICITY	\$2.50
WATER	\$24.42
SEWER	\$29.12
GARBAGE	\$13.68
GREENWASTE	\$6.92
PRESSURIZED IRRIG.	\$15.95
STORM DRAINAGE FEE	\$5.25
ENERGY USE TAX	\$0.15
SALES TAX - NET METERS	\$0.11
Statement Charges	\$98.10
Payment on 05/25/2023	-\$98.10
Amount Due	\$0.00

The information displayed here is provided by Lehi City. If there is a discrepancy, please contact Lehi City. Please note that this bill is only displaying payments made on or after 05/01/2023. Payments made directly to Lehi may or may not be displayed here.