

Craig Andrews

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Utah Public Service Commission

Attn: Commission Secretary

Heber M. Wells State Office Building, 160 East 300 South, Fourth Floor, Salt Lake City, UT 84111

psc@utah.gov

CC: Division of Public Utilities | CC: Utah Clean Energy | CC: Rocky Mountain Power Regulatory Affairs

Re: Public Comment on the Annual Review of the Schedule 137 Net Billing Export Credit Rate

Commissioners:

I am a residential solar customer of Rocky Mountain Power in Ivins, Utah, operating a 6.88 kW DC Enphase system under Schedule 137, Net Billing Service (Account 31978156-001, Enphase Site ID 6076695). I am submitting these comments in connection with the Commission's annual review of the Schedule 137 export credit rate, and I respectfully ask the Commission to reexamine whether the current methodology fairly compensates residential solar customers for the value their exported energy provides to the grid.

The Rate Gap in Practice

During my May 14 to June 15, 2026 billing period, I exported 869 kWh to the grid and was credited at the summer export credit rate of \$0.04855 per kWh, the same rate confirmed by Rocky Mountain Power's Customer Advocacy Team in its August 19, 2026 response to my earlier inquiry. During that same period, I purchased power back from Rocky Mountain Power at retail rates between \$0.093 and \$0.120 per kWh, roughly two to two and a half times what I was paid for the energy I exported. Over a full year, this spread represents an estimated value gap of approximately \$606 for my system alone.

This is not a complaint about the existence of a lower export rate in principle. Avoided-cost based export rates are a legitimate and common ratemaking approach. My concern is narrower: whether the current Schedule 137 rate and its underlying avoided-cost methodology have kept pace with the actual value solar exports provide, including avoided generation costs, avoided transmission and distribution investment, and any capacity or reliability value delivered during the hours solar customers are exporting.

What I Am Asking the Commission to Consider

- Revisit the avoided-cost inputs underlying the Schedule 137 export credit rate to confirm they reflect current generation, transmission, and distribution cost trends, rather than legacy assumptions.
- Evaluate whether a time-differentiated or seasonally adjusted export credit more accurately reflects the value of solar exports during peak demand hours.
- Provide greater public transparency into how the annual export credit rate is calculated, so residential customers can understand and, where appropriate, contest the inputs.
- Consider a phased or indexed adjustment mechanism so the export credit rate does not fall further out of step with retail rates over time.

Closing

Residential solar customers on Schedule 137 have made a real capital investment based on the expectation of a reasonably fair return for the energy they contribute to the grid. I ask the Commission to use this annual review to take a closer look at whether the current export credit rate still reflects that fairness, and I appreciate the opportunity to submit these comments as part of the record.

Respectfully submitted,

Craig Andrews