

July 25, 2017

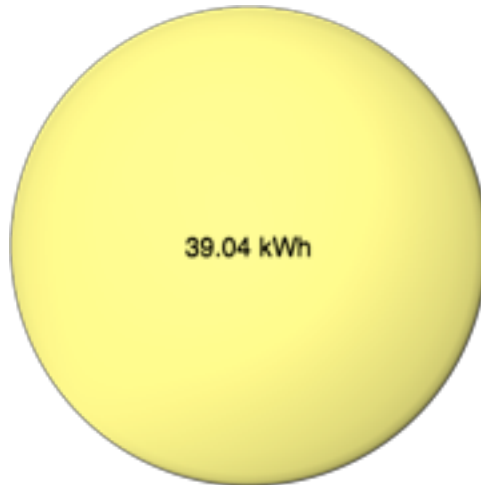
Utah Public Services Commission
Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84111

Re.: Docket 14-035-114

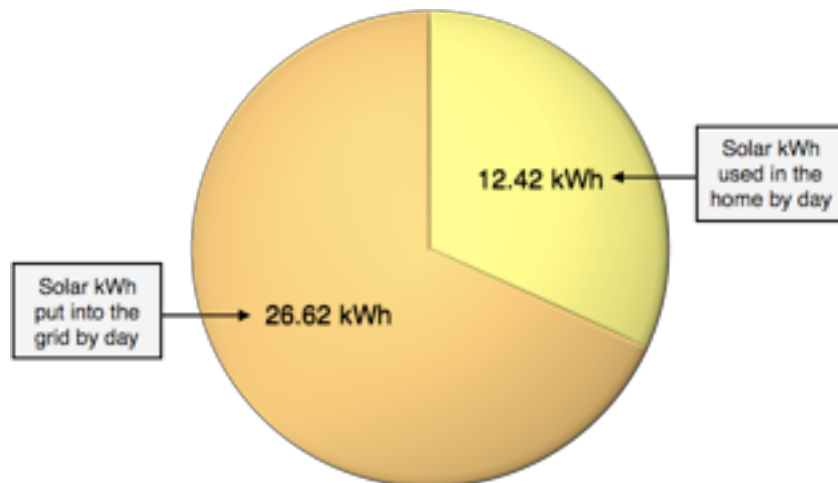
Commissioners:

I am submitting this letter for the benefit of citizens who read the comments posted in this docket, for they deserve to know “the truth, the whole truth, and nothing but the truth” about Rocky Mountain Power’s proposals. Below are my own solar data, compiled after 5 years since installation, that show why RMP’s claim that rooftop solar customers are not paying their “fair share” of infrastructure costs are **completely bogus**.

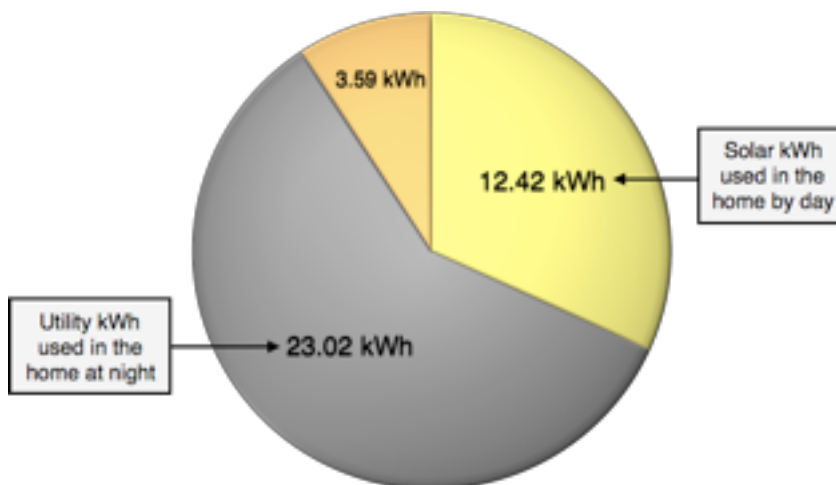
This pie chart shows the average number of kWh than my solar array produces per day—including sunny days, cloudy days, summer, winter, *i.e.*, the overall average.



What happens with those daily kWh? How are they used? As you can see, when the sun is shining during the day, less than 1/3 of those solar kWh power my home, and more than 2/3 **go into** Rocky Mountain Power’s grid:



Of course, at night, when the sun isn't shining, I have to pull power **back out** of the grid to power my home.

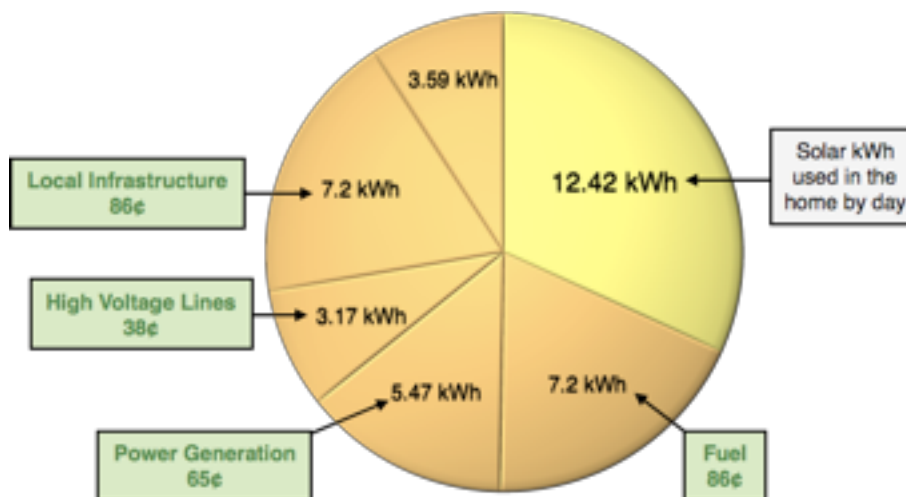


Notice, however, that those utility kWh are **fewer** than the solar kWh that I put into the grid during the day: RMP claims that we solar customers are “selling” our excess solar kWh to the utility at the full rate. Their use of that term is purposely **misleading**. In truth, we are not “selling” anything! The only transaction that occurs is that we **are trading straight across** our clean, renewable, non-polluting solar kWh generated in the day for their dirty, non-renewable, polluting kWh generated by burning coal and natural gas at night.

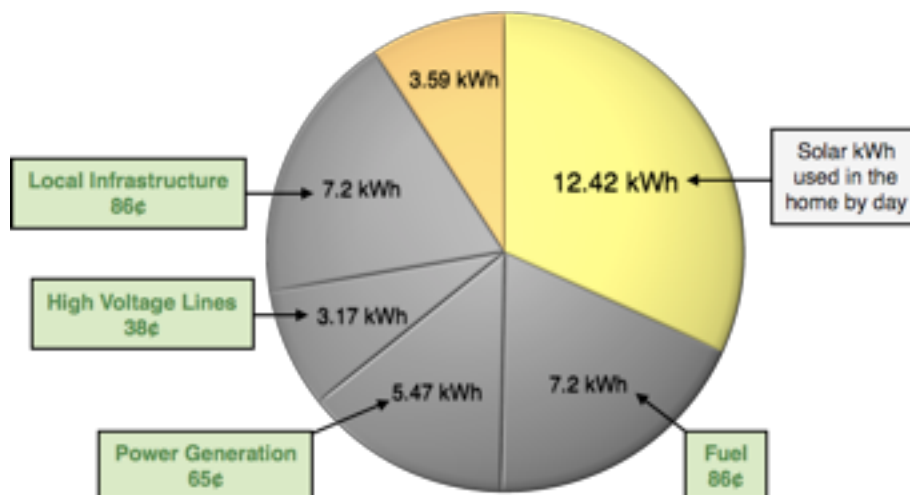
Think about it: who is getting the **better deal** in that **one-for-one swap**? Are clean, non-polluting, solar generated kWh **worth less** than RMP's dirty, polluting, fossil fuel generated kWh? If so, then why does RMP **charge more** for the renewable kWh sold to customers through its [Blue Sky program](#)? Evidently, the utility knows very well that emissions-free electricity **is more valuable!**

But there's even **more to the story** than that. What does RMP do with my 23.02 clean kWh in the day that I swap for its 23.02 dirty kWh at night? **They sell them**, at the full rate, to my nearest neighbors.

According to [statements by RMP to the Deseret News](#), these are the categories and corresponding prices that the utility **charges** those neighbors for my solar kWh —even though RMP has **done nothing** to generate them:

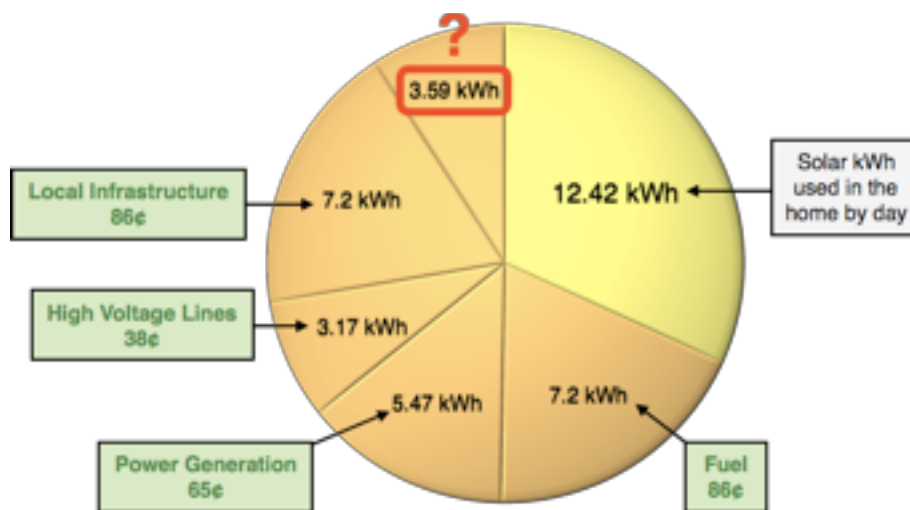


Consequently, the infrastructure costs for RMP's dirty, polluting kWh traded straight across at night **are fully paid for!** Solar customers are **not** "freeloaders":



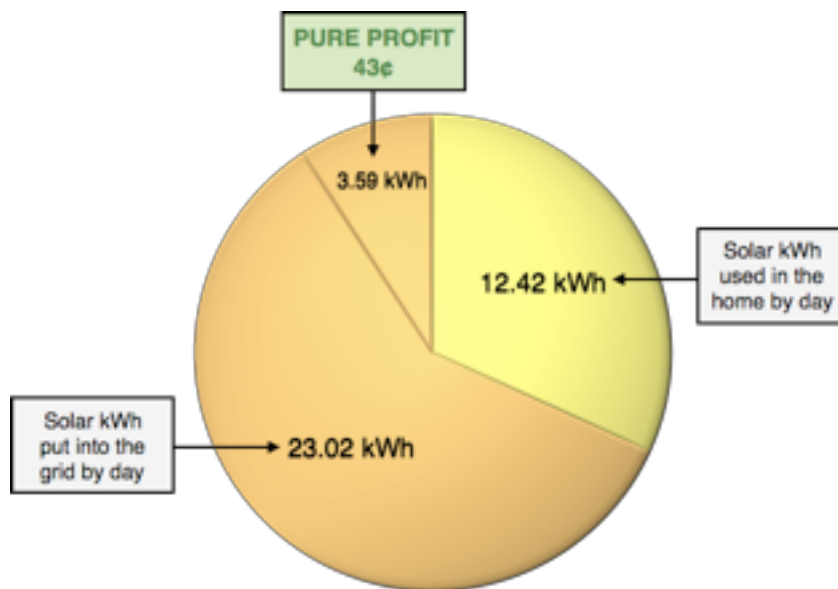
You can therefore see that RMP's claim that solar homeowners are not paying their "fair share" of infrastructure costs is **bogus**. Just like all other customers, solar homeowners pay for as much infrastructure as **we actually use**, if not in dollars, **certainly in traded kWh** —which the utility **sells for dollars at the full rate!**

Yet there is another detail about these clean-for-dirty kWh swaps that RMP always conveniently forgets to mention. Specifically, what about the additional 3.59 solar kWh per day that I generate which are even greater than what I trade with the utility at night? What does RMP do with those excess kWh?



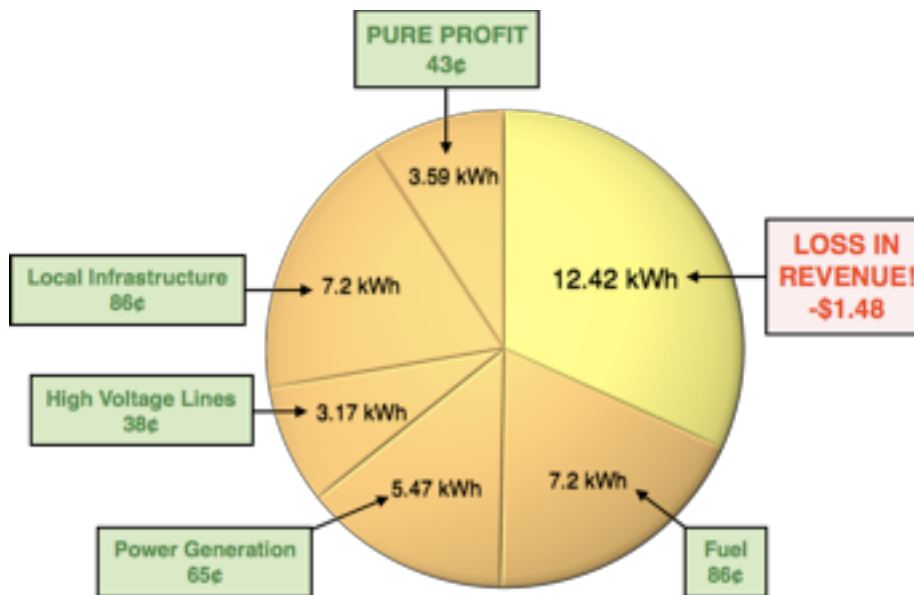
The answer is: at the end of March every year, RMP **confiscates** those kWh, zeroes out the tally, and then likewise **sells them** to my nearest neighbors **at the full rate** —even though RMP hasn't burned one lump of coal, generated one kWh, or used one high voltage line for the sale.

After 5 years, I therefore "donated" to RMP over 6,552 kWh of clean, renewable, non-polluting electricity. At [the average rate](#) of 12¢ per kWh, that's more than **\$786 in pure profit** that the utility has pocketed. Yet RMP now wants to charge solar customers penalty fees for making such "donations." Moreover, in my case, during



those 5 years my solar array has also saved our planet from approximately **63 tons** of dirty, polluting greenhouse gases that RMP would have otherwise emitted into our atmosphere!

This begs the question: since whatever infrastructure I use is **fully paid for** by swapping kWh, and the utility even **makes pure profit** off my excess solar kWh, why would RMP be pushing an agenda to make solar homeowners pay monthly penalty fees? **The simple answer is:** if customers install solar panels to generate some of their own electricity, the utility will earn **fewer profits**. In my case, my solar array reduced RMP's profits by \$1.05 per day, hence they want to ameliorate such potential losses in the future.



Obviously, the ultimate goal of imposing such penalty surcharges is to **discourage future customers** from investing in rooftop solar, and thus slow down the transition away from fossil fuels to clean, renewable sources of energy so that RMP's profits will continue to swell in the future as Utah's population increases, new homes are built, and current homeowners likewise install arrays to reduce their carbon footprint.

Most egregious of all, with this newest rate hike, RMP not only wants to **penalize** solar customers, but even **control the use of their solar kWh** —as if they “owned” them! Specifically, the utility wants to impose a “demand charge” that would require **only** solar homeowners to pay as much as \$90 per month, depending upon the major appliances they use during the day. RMP has no business dictating how customers choose to use their electricity, but even moreso when those customers are **generating the electricity themselves**. If solar customers want to use their array's pollution free kWh to run air conditioners, or a welder in the garage, or a hot tub, or a steam shower, or charge an electric car, or their oven, washer, dryer, dishwasher, and electric water heater all at the same time, **it is none of RMP's business**. Period.

The underlying concern boils down to this: **does** the PSC —or **does it not**— accept that **anthropogenic climate change is real**? Do the commissioners understand what the overwhelming majority of scientists are telling us? Do they not recognize the absolute necessity of transitioning our energy system away from fossil fuels and toward clean, renewable sources of energy as quickly as possible? For decades RMP has dragged its feet to facilitate that transition, so Utahns are stepping up to the plate to take those necessary steps, investing their own hard earned savings to mitigate the imminent threat of global warming. Yet **making more and more money** by doing “business as usual” evidently matters much more to RMP than the harm its **dirty pollution** is wreaking, so the utility now seeks to **penalize** those Utahns for taking matters into their own hands. It is unconscionable that such greed for mammon would take precedent over our air quality, our environment, our climate, our planet, our health, our children's and grandchildren's future.

I implore the PSC to reject RMP's nefarious proposals. As **representatives of the people** of Utah, the Commission should be doing everything possible to **encourage** citizens to invest in renewable energy —**not penalize** their efforts to placate a private utility's monopoly!

Most earnestly,

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