

**From:** Carol Revelt  
**To:**  
**Date:** 11/24/2008 3:57 PM  
**Subject:** Fwd: Comments applicable to net metering

Please add these comments to docket 08-035-78.

Thanks,  
Carol

2008 NOV 24 P 4: 39

158751

>>> "RJ Mendenhall"  
Dear Carol,

10/21/08 6:49 PM >>> RECEIVED

Thank you for including me on this pre rule making. I have included my comments below and posed some questions. I don't know if someone will be able to answer them but I would appreciate a response if possible. Is the public going to be able to attend a meeting prior to this becoming law?

Thank you,

RJ Mendenhall

Comments:

\* Line 255-258. Why is the generation capacity limited to only 15% of peak load? If I read that correctly that limits my possible savings to only 15% of what I use. This essentially guarantees the utility will have 85% sales to the customers.

\* 262-265 Currently there is no provision in the electrical code for load balancing normal installations for residential. Whether the load imbalance comes from usage or from generation the load is still imbalanced. Why are net metering customers required to do this if current residences aren't required to balance their loads?

\* Looking up the code referenced that defines the amount of the credit offered to the generation facility it says this:

54-15-104. Charges or credits for net electricity.

(1) Each electrical corporation with a customer participating in a net metering program shall measure net electricity during each billing period, in accordance with normal metering practices.

(2) If net metering does not result in excess customer-generated electricity during the billing period, the electrical corporation shall bill the customer for the net electricity, in accordance with normal billing

practices.

(3) If net metering results in excess customer-generated electricity during the billing period:

(a) (i) the electrical corporation shall credit the customer for the excess customer-generated electricity at a value that is at least avoided cost;

(ii) the customer may use the credit under Subsection (3)(a)(i) to offset purchases of electricity from the electrical corporation during future billing periods during the same calendar year; and

(iii) all credits that the customer does not use during the calendar year expire at the end of the calendar year; and

(b) the electrical corporation may bill the customer for customer charges that otherwise would have accrued during that billing period in the absence of excess customer-generated electricity.

\* According to (3) (a) (i) the credit is given back to the utility at the Least Avoided Cost, what is that?? Let's put that in price per KWH which is how I am billed. The minimum credit should be what they buy their power for on the open market. Further more there will be adjusted rates here someday like there is in Arizona (maybe it is a plan where you get a lower rate during non peak), in any case if I am generating excess power during this peak my credit should be higher during the peak as well. Doesn't that seem fair, If not why not?

\* According to what is referenced in Red my unused credits are void at the end of the calendar year. Why can't this be made to be a rolling year Jan-Jan, Feb-Feb, etc? Based on (3) (iii) (b) in January I would have no credits to apply to my January bill and so I would be getting a full bill even though I may have had a credit in December? How does that seem fair to anyone but the utility? They just get to keep the power I generated to them and I get dittily squat? How would they like it if I stole electricity from them????

Other than that it looks pretty good to me. Will I be able to get answers to my concerns?

-----Original Message-----

From: Carol Revelt [<mailto:crevelt@utah.gov>]

Sent: Tuesday, October 21, 2008 5:36 PM

To: Carol Revelt

Cc: Rebecca Wilson