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COMMENT DESCRIPTION:

I would like to offer testimony in opposition to the fixed rate fee increases proposed by American Electric Power in case # 16-1852-EL-SSO. I am David Carpenter of 932 Executive Blvd., Delaware, OH, an AEP customer and my home is equipped with a 4.83 kW photovoltaic solar array. ----- Across the US, utilities are being encouraged by fossil-fuel funded and politicized non-profit organizations (such as the Heartland Institute and the American Legislative Exchange Council) to increase their fixed fees, and to lobby against net metering and energy efficiency portfolio standards. We have seen the results in Nevada, Wisconsin, and many other states. This is a deliberate program to weaken the market for distributed power and to eliminate competition. ----- These policies are not in the best interests of the environment or of the economy. They are not even in the best interests of the long-term profitability of the public utilities. It would be better for the public utilities to try to compete within the distributed-power markets instead of against these markets. I believe the PUCO should encourage public utilities to find ways to profitably support increased distributed power, as this is consistent with the commission's mission "to assure all residential and business consumers access to adequate, safe and reliable utility services at fair prices, while facilitating an environment that provides competitive prices." It also

will compel Ohio utilities to make the necessary adjustments in their business models that will enable them to be viable and profitable in the evolving energy markets of the future. ----- Since anti-competition policies like these only affect a given service area, without significant impedance on global markets and technological development, this type of strategy could lead to grid defection, which could lead to degradation of the grid to the point where it might become difficult to service new large industrial users. ----- Distributed power sources, such as rooftop solar, give consumers greater freedom and control of their own power needs. Without distributed power, consumers are forced to get all of their energy from a utility distribution system with a local monopoly. My house is connected to AEP's grid. I can't choose which distribution company my house is connected to. As a consumer, my only real ability to have freedom of choice and energy independence is to produce my own. Rooftop solar, other forms of distributed power, and micro-grids, also improve our national security. Large power plants, regardless of type, are more vulnerable to terrorism and to natural disasters. If a large power plant is destroyed, electrical service to a large area can be disrupted. Distributed power sources and micro-grids can keep homes and businesses in operation, and even help sustain the grid when a large plant is down. Distributed power improves the overall resilience of our electricity grid. ----- Fair pricing and net metering are vital to distributed power. Distributed power sources provide other services besides resilience to the public utilities. These services deserve fair compensation. ----- Solar power, in particular, provides its peak power during peak use, when electricity is most expensive. This decreases the cost of supplying electricity for everyone on the grid. As batteries become cheaper, distributed power sources with energy storage will be able to control the timing of their contribution of surplus power to the grid. This will reduce the needs of utilities for "peaker" plants even more, providing significant savings to the utility, and cleaner air and water for public health. ----- Unlike the large utility-scale arrays, roof-top solar does not reduce the amount of land available for agriculture and for other uses. Utility solar is cheaper, but for the reasons I have already cited for distributed power sources in general, the benefits derived from it are also less. Utility-scale solar should be built in conjunction with, not at the expense of, distributed solar. ----- A fixed-fee increase is the worst form of rate hike. It is regressive in that it disproportionately causes the greatest percentage increases on the customers who use the least energy, discouraging energy competition, discouraging energy efficiency, and placing an unreasonable disproportional burden on the poor. ----- The fixed rate increase does not provide incentives for American Electric Power to change to be a viable participant in a healthy energy market. Like attacks against net metering and against other market mechanisms that provide fair access to distributed power producers, the fixed rate increase enables AEP to eliminate competition without modernizing. This benefits no one in Ohio, and yields future energy development markets and jobs to out-of-state interests.

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