

Sonny Rivers
802 Roubaix Dr.
Rapid City, SD 57702
605-209-3419

Re: Intervention for Docket EL21-011

Dear PUC Commission,

Docket EL21-011 for Black Hills Power to amend its cogeneration tariff proposes a significant change of negative consequence to BHP customers including myself, my business, and employees in the local solar industry. The proposed tariff would deeply undermine the value and feasibility of distributed energy systems and harm BHP customers by denying them of a right to use their own solar power directly.

The proposed tariff amendment claims to be fair to all Black Hills Power customers, but would instead deprive customers of the right to use the electricity they generate. The proposed tariff requires that BHP customers sell 100% of their cogenerated electricity production to the utility and pay a metering fee for cogeneration, which would significantly undercut the feasibility of distributed energy systems for BHP customers and inevitably bring an end to new cogeneration installations.

Due to the proposed buy-all sell-all approach, the value of all cogenerated electricity would be strictly limited to the difference between the avoided cost rate and the customer's energy charge (about 20-30% of the cogeneration electricity's potential value), thoroughly devaluing the benefits of a customer's cogeneration power system. To recover the cost of the \$10 monthly production meter fee alone, at an avoided cost rate of only \$0.0248 per kWh, would require over 400 kWh of electricity generation per month, equivalent to about 40% of the electricity use of an average SD home. The interconnection fee, a minimum of \$100, would require the equivalent of four months of electricity use to be generated for an average SD home. Only beyond recovering these costs could a customer stand to benefit at all from their cogeneration system, retaining only a small fraction of the electricity's real value.

I believe it is also important to take notice that customers are installing their own power generation systems for a number of reasons beyond the inherent value of renewable energy, including the desire for energy independence and resiliency against grid power outages. By not allowing customers to use the electricity they produce (in a direct manner), the proposed tariff would also deny BHP customers of these options.

I am asking the PUC to reject this proposed tariff amendment in its entirety, as it would clearly be of significant negative consequence to Black Hills Power customers who wish to cogenerate or supply their own electricity, while also denying new cogeneration system owners of their ability to directly use electricity generated by their own property.

Sincerely,
R. Sonny Rivers