UE-210804

Comments by James Adcock on Docket UE-210804 Cost-effectiveness Test for Distributed Energy Resources Incorporating CETA
Docket number of this proceeding: UE-210804
Commenting party's name: James Adcock, Electrical Engineer
The title and date of the comment or comments:
Comments Related to Cost-effectiveness Test for Distributed Energy Resources Incorporating CETA, Docket UE-210804
11/24/2021

Received
Records Management
11/24/21 10:39
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Based on [Lazard LCOE 15.0] for various generation technologies, combining with the CETA "administrative penalty" "alternative compliance" off-ramps sets an upper limit "Max Price" on how much the UTC should allow recovery for *any* utility program, including DER. Such "Max Prices" per MWh are calculated below:

$60 + ($45 to $74) New Combined Cycle => Max Price $134
$60 + ($19 to $29) Existing Combined Cycle => Max Price $89
$84 + ($151 to $196) New Gas Peaking => Max Price $280
$84 + ($27 to $41) Existing Gas Peaking => Max Price $125

In comparison, utility-scale Wind and Solar represent extraordinary (relative) bargains, as follows:

Solar Utility Scale ($28 to $41)
Wind Utility Scale ($26 to $50)

In short a utility which does not *start* by maximizing the amount of Wind and Solar (and Efficiency) in their system is simply ripping off Ratepayers. Wind and Solar can be built at levelized MWh prices equal to *just* the natural gas fuel costs of natural gas generation, so there is no reason *not* to build Wind and Solar. In particular UTC should act immediately, strongly and decisively against Utilities which might want to waste Ratepayers monies on programs costing hundreds of dollars per MWh, in order to simply (in their minds) play the "Get Out of Jail Free" card of hitting the supposed 2% per year limit (in their minds) -- even though no such limit exists either before or after 2030. In particular CETA states that Utilities *shall* reach 80% clean (no more that 20% emitting) by 2030 -- without exception.

Thank you for your consideration,

James Adcock, Electrical Engineer