

W A S A T C H



Clean Air Coalition

June 28, 2007

Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City UT 84111

RE: Tariff PSCU No. 47
Schedule 70 – Renewable Energy Rider – Optional
Schedule 72 – Renewable Energy Rider – Optional – Bulk Purchase Option

Dear Commissioners,

The Wasatch Clean Air Coalition (WCAC) respectfully submits comments on the proposed tariff changes associated with Tariff PSCU No. 47 Schedule 70 - Renewable Energy Rider and Schedule 72 – Renewable Energy Rider –Bulk Purchase Option filed by Rocky Mountain Power.

WCAC participated in the development of the Blue Sky Program, and we were present when Scottish Power proudly rolled out Blue Sky prior to the deadline contained in the purchase agreements.

At that time, the Land and Water Fund of the Rockies (now Western Resource Advocates) and WCAC agreed that a large portion of the funds collected from customers should be allocated to customer education and outreach (currently 24%) in order to facilitate the success of the program. And it has been successful. However the time of startup is long past, and the proportion of customer funds allocated to outreach should be re-evaluated.

One difficulty in the early days of the program was that many potential participants considered that the program should entitle the participants to some future benefit, or insulation from increased fuel costs since they were investing in fuel-less generation. The LAW Fund advocated strongly that such ‘insurance’ was a rational benefit, particularly as the price at that time was \$4.75 per 100 kilowatt-hour block.

Simple justice would seem to require that when a carbon adder appears in rates, those who invested in renewables should be insulated. We paid in full the standard rate for electricity and paid extra to develop renewables that benefit all with lower emissions and water consumption. We should not be exposed to carbon risk, at the proportion we subscribe.

Please consider the idea of insulating Blue Sky subscribers from carbon costs. If it were determined that this was desirable and just, a method to implement it is within the creativity and skill of the Company and the Public Service Commission.

Peace,

Kathy Van Dame
Policy Coordinator
Wasatch Clean Air Coalition
1148 East 6600 South # 7
Salt Lake City, Utah 84121
dvd.kvd@juno.com 801-261-5989