

To: Utah Public Service Commission
Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84114

From: *Enfinity America Corporation, Bob Hopper*
Data Center Pulse, Dean Nelson (Data Center Pulse represents over 1,800 global datacenter owners, operators and user members)
Big-D Construction, Forrest D. McNabb
RenewableTech Ventures/Utah Technology Council Clean Tech Sector Co-Chair, Todd Stevens
IBEW Local 354, Rich Kingery
EnerBank USA, Louise P. Kelly
Craig L. Cardall, MBA, Real Estate Manager
The Front Climbing Club, Dustin Buckthal
Garbett Homes, Rene Oehlerking
Build Green Utah, Geri Strand
Gardner Engineering Alternative Energy Services, Ken Gardner

Subject: Comments on Docket 07-035-T14 – In the Matter of the Approval of Rocky Mountain Power’s Tariff P.S.C.U. No. 47, Re: Schedule 107 - Solar Incentive Program; Request for Comments

June 9, 2011

Dear Utah Public Service Commission:

In response to your request for comments on *Docket 07-035-T14* and whether or not a continued or expanded solar PV program in Utah is appropriate and how that program might be structured, we submit the following comments. We appreciate the opportunity to provide input on this matter.

As representatives of Utah’s business community, we are supportive of the continuation and expansion of Rocky Mountain Power’s Solar Incentive Program. We consider the program to be an important tool to drive local economic development, create jobs, and provide important risk mitigation benefits. As Utah’s energy demands continue to grow, we think it is prudent to pursue opportunities to balance our energy portfolio and provide price certainty and a hedge against increasing risks inherent to the energy sector. We believe that the utility solar incentive program can offer an economical resource for Rocky Mountain Power and its customers, while also helping to diversify our energy mix.

It is our understanding that PacifiCorp recently ran some sensitivity analyses, as part of their 2011 Integrated Resource Plan, to model a distributed solar incentive program (both a \$2/watt and a \$1.50/watt incentive). The 2011 IRP indicates that the model selected all of the available solar, which suggests that a continued and expanded solar incentive program can be an economic resource for ratepayers. In addition, in Rocky Mountain Power’s *Three-Year Assessment of the Solar Incentive Program*, RMP provided two different cost-benefit analyses of the program with 5 and 10 percent administrative costs, which dramatically improved the cost-effectiveness of the program.¹ Given these two pieces of information, we recommend the Commission approve

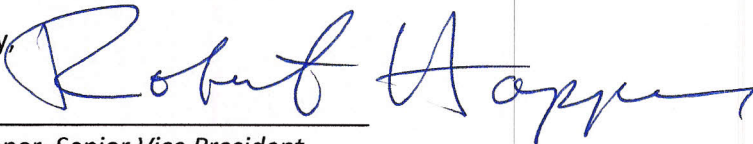
¹ *Three-Year Assessment of the Solar Incentive Program*, Rocky Mountain Power, 12/13/10. p 9. Docket No. 07-035-T14 – In the Matter of Approval of Rocky Mountain Power’s Tariff P.S.C.U. No. 47, Re: Schedule 107 – Solar Incentive Program

an expanded solar program (with lower administrative costs, such that it passes the utility cost test). An expanded utility incentive would lead to greater private investments in solar, which would have numerous positive impacts on Utah's economy.

Utah's untapped solar energy resource and vast rooftop space offer promising opportunities to reduce consumer energy consumption and provide additional value to Utah's energy grid. Rocky Mountain Power notes in their 2010 annual report that "solar resources, while not coincident with system peaks do contribute a percentage of energy during the higher load and energy cost hours of summer days."² We agree with this assessment and see Utah's commercial districts, which use energy at times when system demand and energy prices are high, as prime opportunities to maximize the benefits of distributed solar. However, the solar pilot's current commercial system cap of 15 kW for the incentive (and the overall program cap of 107 kW/year) is far too small to encourage sizeable solar projects on commercial facilities. We appreciate the efforts by Rocky Mountain Power, the Public Service Commission, and all involved stakeholders to monitor and assess the value of solar for the duration of the small pilot program. Yet, we are concerned that the size and system caps in the program inherently restrict the benefits that solar can deliver to the system, especially the benefits that larger commercial systems can deliver. As such, we recommend that the current program be expanded to enable larger commercial businesses to take advantage of this unique and abundant on-site resource, which helps reduce consumer demand during the peak hours of the day. We would also be supportive of a revised incentive structure for much larger commercial systems that offers an incentive correlated to the output of the solar system, leveled over an established time frame to minimize the upfront cost impacts to the utility (and ratepayers). This type of incentive can also provide assurance that the system will be properly maintained to maximize output. Lastly, a well-designed solar incentive program can help Utah to keep pace in the clean energy economy and seize new opportunities for economic development, job creation, and manufacturing that the clean energy economy provides.

In summary, we fully support and encourage the adoption of an expanded and appropriately-designed solar incentive program as a means to increase private investments in solar and support the emergence of the clean energy economy in Utah. We look forward to the opportunity to remain engaged on this important matter going forward.

Sincerely,



*Bob Hopper, Senior Vice President
Enfinity America Corporation
PO Box 682336
Park City, UT 84068
(435) 604-0336
bhopper@enfinitycorp.com*

(Signed and submitted to the Utah Public Service Commission for Docket 07-035-T14 with permission and on behalf of the businesses listed below)

Enfinity America Corporation

² *Solar Photovoltaic Incentive Program (Schedule 107) Annual Report for Program Year 2010, Rocky Mountain Power, 03/07/11, p 13.*

Dean Nelson
Chairman & Founder
Data Center Pulse
(510) 329-7498
<http://datacenterpulse.org/>

Forrest D. McNabb
Senior Vice President
Big-D Construction
404 West 400 South
Salt Lake City, UT 84101
(801) 415-6030
fmcnabb@big-d.com

Rene Oehlerking
Marketing Director
Garbett Homes
273 North East Capitol Street
Salt Lake City, UT 84103
rene@garbetthomes.com

Geri Strand
Executive Officer
Build Green Utah
PO Box 980850
Park City, UT 84098
geri@pcahba.com

Louise P. Kelly
President & CEO
EnerBank USA
1245 E Brickyard Road, Suite 640
Salt Lake City, UT 84108
LPKelly@EnerBankUSA.com

Craig L. Cardall, MBA
Real Estate Manager
257 East 200 South, Suite 125
Salt Lake City, Utah 84111
(801) 707-1892

Todd Stevens
Co-Chair, Utah Technology Council Clean Tech Sector
RenewableTech Ventures
136 E. South Temple, Suite 925
Salt Lake City, UT 84111
(801) 363-1700
todd@renewablevc.com

Rich Kingery
Business Manager
IBEW Local 354
3400 West 2100 South
Salt Lake City, UT 84119
(801) 972-9354
rich@ibew354.org

Dustin Buckthal
Owner
The Front Climbing Club
1450 S 400 W
Salt Lake City, UT 84115
(801) 466-7625

Ken Gardner
Owner and Manager
Gardner Engineering Alternative Energy Services
5875 South Adams Avenue Parkway
Ogden, UT 84405
(801) 476-0202 ext 201