

June 18, 2008

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

Attention: Julie P. Orchard
Commission Administrator

Re: Docket No. 08-035-T04, Schedule 135, Net Metering Service
Response to Division of Public Utilities Comments

On June 10, 2008, Rocky Mountain Power filed proposed tariff changes associated with comments received from the Utah Division of Public Utilities ("Division") for proposed modifications to Schedule 135.

In its memo of June 10, 2008 and comments, the Division recommended approval of Rocky Mountain Power's proposed changes to Schedule 135 subject to four additional changes to the Application section of the tariff. Rocky Mountain Power agrees with three of the Division's recommend changes which are intended to make the tariff consistent with Utah's recently passed Senate Bill 84. The first recommendation is to remove the language that allows a net metering customer to interconnect to the Company's transmission facilities. The second recommendation is to remove the limitation that provides the option of using switchgear (rather than an inverter) solely to non-residential systems. The third recommendation is to add language clarifying that, if the net metering program reaches the 0.1 percent of Utah peak load size limit, the program may be closed to new participants. Existing net metering customers would continue on the program.

Rocky Mountain Power does not agree with the fourth change proposed by the Division, which changes the quantification of the 0.1 percent of Utah 2007 peak load from 4,424 kilowatts, as included in the Company's filed tariff revision, to 4,615 kilowatts. The tariff revision filed by the Company reflects 0.1 percent of Utah's contribution to the system coincident peak. The proposed change by the Division is based on Utah's non-coincident peak. While Rocky Mountain Power does not have a strong opposition to using the larger size limitation in the tariff, the Company believes the language in UCA 54-15-103(2)(a) to "0.1% of the electrical corporation's peak demand during 2007" refers to the Company's coincident peak, not the Utah stand alone, non-coincident peak.

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Rocky Mountain Power appreciates the Division's recommendation for approval of the tariff changes and welcomes the opportunity to work with the Division on the continuous improvement of the net metering program.

Very truly yours,

Jeffrey K. Larsen

Vice President, Regulation

Cc: Dennis Miller/DPU

Cheryl Murray/CCS