



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

From: Creative Energies, LLC

Date: November 22, 2011

Docket: Docket 11-035-104--In the Matter of an Investigation into Extending and Expanding the Solar Incentive Program and Possible Development of an Ongoing Program and 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

Subject: Comments in Response to Division of Public Utilities’ *Solar Incentive Report: Division Solar Incentive Program Review and Recommendations*

Dear Chairman Boyer, Commissioner Allen, Commissioner Campbell, and Commission Staff:

Our small solar business would like to thank the Commission and Rocky Mountain Power for the opportunity to publicly express support for the extension and growth of Rocky Mountain Power’s pilot solar incentive program. This program has allowed the residents and ratepayers to participate in the nation’s fastest growing industry, support new jobs, and help Utah strive for energy independence. However, it is our hope that the Public Service Commission allows Rocky Mountain Power to move beyond a pilot program to a permanent, uncapped program of \$1.25/watt for all suitable residential and commercial sites.

Rocky Mountain Power (RMP) has demonstrated that this type of incentive program would be economically feasible, and even profitable. So much so that under traditional capital budgeting rules, one could say RMP is obligated to their shareholders to adopt a positive net

present value opportunity like this. Further, the size and scope of this incentive program would be in-line with RMP's peer utility companies in the southwest like Arizona Public Service and Xcel Energy. Additionally, if the kilowatt caps were removed, it would ensure for equity of rebate funds to all market segments within RMP territory.

We support the Division's recommendation that the Commission create a new Solar Incentive Program Workgroup; we request that this workgroup provides for formal publically noticed meetings and a transparent public process that allows for all interested stakeholders to provide input throughout the process. In keeping with the above request for a public process, we would like to have the opportunity to be involved in developing and providing input on a straw man proposal on the new incentive program design. We believe a diverse stakeholder group can bring new perspectives to the table and a greater depth of understanding and expertise with solar incentive programs that will benefit the process.

Lastly, we would like give special note; if the solar incentive was made a permanent, uncapped program of \$1.25/watt our business would have to hire 2-10 new employees to account for the increase in demand for our services. Needless to say, as we are not an unusual solar company, we believe our competitors would have to do the same. This would create job growth and economic opportunity throughout our region. Thank you for your time and consideration.

Sincerely,

Charlie Boas
Sales & Business Development Director, Utah Office
Creative Energies, LLC