

To: Chairman Ted Boyer

Commissioner Ric Campbell Commissioner Ron Allen

**Utah Public Service Commission** 

Heber M. Wells Building 160 East 300 South Salt Lake City, UT 84114

From: Mayor Dana Williams, Park City Municipal Corporation

Mayor Tom Pollard, Town of Alta

Stephanie Dolmat-Connell, Summit County

Ashley Kohler, Summit County

Peter Metcalf, Black Diamond Equipment Bob Hopper, Enfinity America Corporation Elias Bishop, Utah Solar Energy Association

Charlie Boas, Creative Energies

Mark Richards, Intermountain Wind & Solar

Lon Huber, Suntech Power Brok Thayn, Hunt Electric, Inc. Rich Kingery, IBEW Local 354

Ron Barness, CarbonFree Technology

Bill Wilson, DwellTek

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James W. Johnston, The NRG Bureau / Progressive Power & Solar

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Harold Cook, Recycle Utah Katie Plumb, Recycle Utah

Karen Hevel-Mingo, Breathe Utah

Linda Johnson, League of Women Voters Salt Lake

Kathy Van Dame, Wasatch Clean Air Coalition

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

Subject: Comments in Response to Rocky Mountain Power's application for approval of a solar incentive program (filed with the Commission on August 10<sup>th</sup> 2012)

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

We represent a diverse group of businesses, local governments, organizations, and individuals that have been tracking and/or involved in the Solar Incentive Program Workgroup, which was initiated by the Commission and facilitated by the Division of Public Utilities, since September 2011; some of us have been involved in the Rocky Mountain Power Solar Incentive Pilot Program efforts since its inception. We support the emergence of the clean energy economy in Utah, and we support and encourage the adoption of an expanded and appropriately-designed solar incentive program to increase private investments in Utah's solar energy resource. We'd like to thank the Commission for the opportunity to provide comments and remain engaged in these important proceedings. We'd also like to acknowledge and thank the Division of Public Utilities for facilitating the Solar Incentive Workgroup and providing a public forum for stakeholder dialogue and input on the development of the proposed incentive program design.

We are highly supportive of the application for an expanded solar incentive program and encourage the Commission's approval of the application. We commend Rocky Mountain Power for introducing a solar program that passes the utility cost test, that is designed to be cost-effective, and that provides net benefits to ratepayers and the grid. While we consider Utah's distributed solar potential to be well beyond what is proposed in the current incentive program, we recognize that this program is an important step toward expanding Utah's distributed solar energy resource.

Distributed solar PV can help meet Utah's growing energy demands (especially during higher energy summer months and higher cost hours), while providing all Rocky Mountain Power customers with an array of benefits. As previous comments on the solar incentive program have pointed out, distributed solar PV is an important piece of Utah's energy puzzle and can help provide a hedge against increasing risks inherent to the energy sector. As is shown in Exhibit J – RMP Solar Incentive Program, Tab "Exhibit C - Expenditures" of Rocky Mountain Power's filed application, the proposed utility solar incentive program, if approved, will offer an economical resource for Rocky Mountain Power that

benefits its customers and serves the public interest. In addition, an expanded incentive can help leverage significant private investments in solar energy and help Utah seize expanding opportunities for economic development, job creation, and manufacturing that the clean energy economy provides.

We acknowledge that the proposed program reflects considerable stakeholder input and appreciate the time spent to develop a solar program that has broad support from numerous parties involved in the Solar Workgroup Process. We also understand that developing a solar incentive program that diverse stakeholders can support requires concessions and compromises from those involved. We are highly supportive of ongoing opportunities to review and make adjustments to the program, as needed, to maximize the benefits and values this program provides in the residential and non-residential sectors. For example, we'd like to see a provision to allow customers the option to assign their incentive to the solar installer as a means to streamline the process and reduce transaction and administrative costs. It is our understanding that this provision has been in place throughout Rocky Mountain Power's five-year Pilot Incentive Program; we'd like to consider adding this provision to the proposed incentive program in the future. Additional program adjustments may be warranted to foster sustainable market growth, maximize economies of scale and achieve continued cost reductions over time. We look forward to continued opportunities to provide input and remain engaged in this important effort.

In conclusion, we strongly encourage the Commission to approve the application for the proposed solar incentive program as soon as possible. Thank you for your time and consideration of these comments.

Sincerely,

Mayor Dana Williams

Park City Municipal Corporation

Signed and submitted August 29, 2011 with permission from and on behalf of the following businesses and individuals:

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