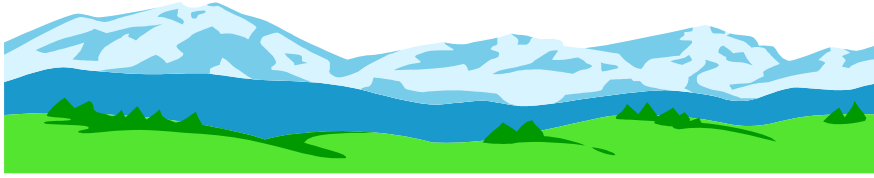


W A S A T C H



Clean Air Coalition

November 25, 2008

Utah Public Service Commission
160 East 300 South
Salt Lake City, Utah, 84111

Re Docket No. 07-999-08

Thank you for the opportunity to comment on this matter, and for the careful attention that the Commission and staff have given to the issue of net metering in Utah.

Net metering has been described as “providing the most significant boost of any policy tool at any level of government...to decentralize and ‘green’ American energy sources.” By compensating customers for reducing demand and sharing excess electricity, net metering programs are powerful, market-based incentives that states use to encourage energy independence.”¹

This same report in a list of ‘best practices’ on pg 89/91 gives the recommendation not to limit total capacity because “Placing a cap on aggregate net metering capacity is counter productive, potentially impeding the growth of the very technologies net metering is designed to promote” and pg 22/24 “...create uncertainty for customers considering net metering. Since they have no way of knowing when capacity limits will be met, they cannot effectively plan for future DG installations. This regulatory uncertainty inhibits renewable energy investment.” .

Particularly in Utah, where we have such high peaks for air conditioner loads, small scale solar on residences has the potential to significantly reduce the need for expensive super peak power. This energy will relieve some of the transmission constraints on our grid during hot weather.

Rocky Mountain Power and Utah customers will benefit following the Interstate Renewable Energy Council (IREC), et al, recommendation to increase program capacity to at least 5% of the utility’s peak demand, or even better remove the cap totally.

Regarding the appropriate value for excess customer generated credits; the current practice of using the retail rate for residential customers is appropriate.

Thank you for your attention to this matter.

Peace,
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¹ See pg 6/8 Freeing the Grid Oct 2008 http://www.newenergychoices.org/uploads/FreeingTheGrid2008_report.pdf