



May 1, 2007

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

RE: Tariff PSCU No. 47; Schedule 107 – Solar Incentive Program

Dear Commissioners,

I am writing in support of the recently submitted tariff by Rocky Mountain Power (RMP) for approval of Schedule 107 - Solar Incentive Program. SunEdison, LLC, is North America's largest solar energy services provider, providing solar-generated energy to a diverse client base of commercial, municipal and utility customers. We have offices in New Jersey, Maryland and California, and are opening our fifth office in Colorado, where we are currently building an 8.2 MW solar facility that will create 50-70 new jobs.

We are supportive of this program as it is an important initial step towards developing a vibrant solar market in Utah. Utah has some of the best solar resources in the country but is quickly falling behind states like Maryland, New Jersey, Colorado, New Mexico, & Massachusetts that have aggressive solar programs. Solar electricity is a carbon-free resource that provides electricity during high cost hours of the day, and can also help meet Utah's growing peak demand.

We would like to suggest two changes be made to the proposed program. Although not specifically stated in the tariff, the implementation plan calls for transfer to RMP all Renewable Energy Credits (RECs) associated with systems developed by the incentive program. RECs can provide a valuable revenue stream to help finance solar projects, and have greater value than being provided in this program. For example, in Colorado Xcel Energy provides a \$2/W incentive to install PV systems plus \$2.50/W for a 20 year stream of RECs, for a total incentive of \$4.50/W. Rocky Mountain Power could legitimately seek a portion of the RECs based on its relatively small contribution to the total cost of a system, but that portion should be determined by the Commission. The second change is to expand the program beyond 100 kW per year, so that companies like SunEdison can bring the benefits of solar electricity to Utah on a larger scale for larger customers. While we recognize this is a pilot program, we suggest that it grow quickly to allow for multi-megawatt solar projects.

With these changes, this pilot program deserves funding and we request that the Commission provide approval of this tariff and the Solar Incentive Program. We commend Rocky Mountain Power for bringing this program forward.

Sincerely,

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