



June 7, 2011

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

RE: Docket No. 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

Utah Public Service Commission:

I would first like to thank Rocky Mountain Power and Commission for their work to date on the pilot solar PV rebate program. Further, I would like to thank Commission in providing this opportunity to submit public comments regarding whether a continued or expanded solar PV program in Utah is appropriate and how that program might be structured.

I am the Program Coordinator of the Utah Solar Energy Association. We seek to provide the education and resources needed to understand, appreciate, and adopt energy efficiency and renewable energy. The current 107 kW/year solar incentive program is appreciated by the solar industry, but it has never been enough to meet the public's needs. A significant expansion of the program is necessary.

Utah is only one of two states in the Union with A rankings for both its net metering and interconnection standards according to the December 2010 issue of "Freeing the Grid." However, despite this, public interest in the technology, and Utah's vast solar resource, Utah still lags behind numerous other states in solar watts installed. This is because a robust solar market requires the trifecta: 1) net metering, 2) interconnection standards, and 3) rebates. These are the three primary legs leasing companies such as SunEdison and Sungevity look for prior to entering a state to provide leasing options for would-be solar adopters. Thus an expanded rebate program is Utah's primary need to developing a robust and mature market with economies of scale.

Until costs drop further, a \$1.50/watt rebate with either a high cap (10 MW/year) or no cap at all would be sufficient. For larger installations of 100 kW or more, Commission could consider a production-based incentive on a per-kWh basis over a determined amount of time. This would thus minimize the upfront capital outlay of Rocky Mountain Power.

Such a rebate is in the best interest of the utility because RMP would be leveraging the private investment of the homeowner, business owner, or entrepreneur, for only \$1.50/watt; but still get the peak-hour benefit an \$8/watt solar system provides. Utah as a state would also see significant economic development as a result of the installations spurred by the rebate.

Sincerely,

A handwritten signature in cursive script that reads "Benjamin Turner".

Benjamin Turner
Program Coordinator
Utah Solar Energy Association