

November 13, 2008

RE COMMENTS:

Issues of capacity limitation and payment for net excess generation applicable to Rocky Mountain Power are being addressed in Docket 08-035-78: In the Matter of the Consideration of Changes to Rocky Mountain Power's Schedule No. 135 - Net Metering Service. Comments on these two issues are due on November 26, 2008, as indicated in the Commission's request for comments

Dear Merilee,

At the lat technical net metering hearing it was mentioned that the "avoided cost" rate of 4.5 cents had not been updated for "a long time". The comment was made that if the new gas facilities were included into the "avoided cost" calculations that the "avoided cost" rate would be significantly higher. I understand that Utah law requires use of the "avoided cost" rate in payment for excess power generation. It seems the Public Service Commission should require a current "avoided cost" rate. By continued delayed "avoided cost" rate calculations the effect is to understated "avoided cost" . By understating the "avoided cost" an artificial barrier is created to net metering projects.

I would ask the Public Service Commission to change the "avoided cost" calculation process in a manner keeps the "avoided cost" rate current. This action should help reduce barriers to the development of "net metering" projects.

Truthfully,

Mike Adams

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