



TO: The Public Service Commission of Utah
Commissioner Ted Boyer
Commissioner Ron Allen
Commissioner Richard Campbell
Merilee Livingston

SUBMITTED BY: Park City Municipal Corporation, on behalf of Signatories:
McMullin Homes, Gold Medallion Homes, Salt Lake City, Beaver County Economic
Development, City of Moab, Park City, Town of Springdale, 3form, Sharp Electronics
Corporation, Solar Energy Solutions Group, The Solar Alliance, Black Diamond Equipment Ltd,
Petzl America, Inc., Park City Mountain Resort & Powdr Corporation, Kennecott Land, Gardner
Engineering, The Director of the Utah Catholic Diocese Peace & Justice Commission, Utah
United Religions Initiative, Alder Photo, and Packsize, LLC

RE: Comments for the Record for January 12th Hearing - In the Matter of the Consideration of
Changes to Rocky Mountain Power's Schedule No. 135 – Net Metering Service Docket No.
08-035-78

DATE: January 12, 2009

Dear Commissioners:

We the undersigned local governments, businesses, and organizations respectfully submit these comments for the January 12th hearing called by the Public Service Commission of Utah (“the Commission”) regarding Docket No. 08-035-78 - In the Matter of the Consideration of Changes to Rocky Mountain Power's Schedule No. 135 – Net Metering Service. We regret that some of us are unable to appear in person at the hearing; as such, we submit these comments in our stead and request that they be read aloud at the hearing for the public record.

It is our understanding that the Commission and involved parties have held numerous meetings and technical conferences on net metering and there have been several opportunities for the public and interested stakeholders to provide input on this important and complex issue. We commend the Commission for their efforts on this matter and for providing an open and public forum for discussion. We appreciate the opportunity to provide comment today.

We represent a group of diverse stakeholders hugely supportive of increased adoption of clean, renewable energy technologies in Utah. Several of us have adopted, or are considering, renewable energy systems on our businesses, government facilities, and/or homes. Others are actively involved in the renewable energy industry. We view both distributed and utility-scale renewable energy as key pieces to Utah's "energy pie" that can help improve air quality, minimize carbon risk, provide a hedge against fuel volatility, and create new economic development opportunities across the state. We consider net metering a critical factor in helping Utah reap the benefits of renewable energy and stay competitive with surrounding states.

In regard to the Commission's request for input on the recommended changes to Rocky Mountain Power's Schedule No. 135 – Net Metering Service Docket No. 08-035-78 issued on December 18, 2008, we submit the following comments:

1. We applaud the Commission for their vision and leadership on the matter of net metering. It is our understanding that the Commission's recommendations reflect best practices from net metering programs across the country. Incorporation of these best practices in Rocky Mountain Power's Net Metering Service recognizes that renewable energy is a valuable source of energy that provides numerous benefits to Utah businesses, governments, and citizens. We strongly encourage the Commission to approve the adoption of best practices for net metering as a means to increase adoption of clean, inexhaustible renewable energy across the state.
2. We support the Commission's recommendations to remove reference to a cap in the tariff. However, if the current law precludes the elimination of a cap, we support the Commission's proposed limit of 20% of Rocky Mountain Power's 2007 peak demand. This reflects a vast improvement over the current 0.1% cap and will allow significantly more customers the option to install and net meter renewable energy systems.
3. We strongly support the Commission's recommendation to value excess generation for residential and small commercial net metering customers at the full retail rate. Renewable energy generated without harmful emissions available for on-site consumption is increasingly valuable for numerous reasons, and we would like to see citizens and businesses adequately rewarded for the benefits they provide to the grid, the environment, and the economy.
4. It is our understanding that the value for net excess generation for large commercial customers is more complicated because of the nature of demand and energy charges. In general, we are supportive of a decision by the Commission that allows large commercial customers to get full value for any excess generation they provide to the grid (as proposed for residential and small commercial), and we support providing this class of customers the option to identify the most equitable means to value any excess generation they provide.

5. We are supportive of adding tariff language to clarify that net metered customers will not be subject to a minimum monthly bill fee in the event they provide excess generation during a month. We feel this is an equitable recommendation in line with Utah's Net Metering law.

6. We strongly support adding tariff language to clarify that any Renewable Energy Credits (RECs) associated with all generation are owned by the customer-generator (and can be designated to a third party via an agreement with the customer). Given that renewable energy systems require significant up-front capital investments and RECs are a highly valued commodity, the value of RECs often play a role in the financing of these systems. Customer investment in a renewable energy system entitles him/her/the business to full ownership of those RECs, and we commend the Commission for their recommendation and urge the adoption of this best practice.

We appreciate the opportunity to provide these comments on this important matter.

Sincerely,



Mayor Dana Williams

Mayor Dana Williams
Mayor
Park City Municipal Corporation

The undersigned businesses, organizations, and local governments representing the following sectors:

Building Community
Local Government
Manufacturing
National Corporations/Organizations
Outdoor Industry/Tourism
Renewable Energy Industry/Clean Energy Organizations
Religious Community
Small Business

Building Community

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