



August 29, 2012

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

RE: Docket 11-035-104--In the Matter of an Investigation into Extending and Expanding the Solar Incentive Program and Possible Development of an Ongoing Program

Dear Public Service Commissioners:

In response to Rocky Mountain Power's application for approval of a solar incentive program (filed with the Commission on August 10<sup>th</sup> 2012) we submit these comments for your consideration. As participants in the Solar Incentive Workgroup, we'd like to acknowledge and thank all those involved in the Workgroup for their time and energy on this important effort. We greatly appreciate the opportunities to engage in stakeholder discussions and provide input on the program through this Workgroup.

Salt Lake City and Salt Lake County are highly supportive of Rocky Mountain Power's (RMP) application to extend and expand their solar incentive program, which has been shown to be notably cost-effective with a Utility Cost Test Benefit to cost ratio of 1.63.<sup>1</sup> As noted in RMP's application, this ratio compares favorably with current demand side management and energy efficiency programs offered by RMP. We are also supportive of the proposed cost recovery and the annual program report provisions outlined in the filed application. As the experience with the pilot solar incentive program has demonstrated, annual program reviews provide an important opportunity for interested stakeholders to review the program and suggest any necessary adjustments to respond to any changes in market conditions.

---

<sup>1</sup> Table 3, Exhibit D – Cadmus Cost-effectiveness Results for the Proposed Utah Solar Incentive Program. August 27, 2012. Pg. 4.

We consider distributed solar to be an integral component of our energy future given the price stability, energy security, and long-term air quality benefits distributed solar can provide. The solar installations located throughout Salt Lake City and Salt Lake County, combined with the ongoing collaborations among numerous stakeholders, are helping address the Salt Lake Valley's air quality problems. As we continue our efforts to expand the opportunities for solar energy in our respective communities, we applaud Rocky Mountain Power for their proposal to expand their solar incentive program and be responsive to growing customer demand for clean, distributed energy resources.

In previous comments filed for this Docket and Docket 07-035-T14, we have expressed our strong support for a continued and expanded solar incentive program, noting that an expanded solar program can be an economical resource for the utility and ratepayers. We have also noted that an expanded solar program would also be in the public interest for several reasons, including reduced air pollutants and greenhouse gas emissions, expanded transportation solutions to address our air quality challenges, preservation of our precious and limited water and natural resources, job creation and sustainable economic development opportunities.

The proposed solar program will significantly expand the amount of distributed solar on the grid, which will augment the aforementioned benefits for Utah's citizens, businesses, local governments, and ratepayers. As such, we are eager to see this program approved and implemented as expeditiously as possible.

We strongly support this application and encourage the Commission to grant approval for this program in accordance with the proposed timeframe. Thank you for your consideration of these comments.

Sincerely,



---

Ralph Becker  
Mayor, Salt Lake City



---

Peter M. Corroon  
Mayor, Salt Lake County