

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

From: See List of Businesses on Pg. 2
Subject: Comments on Docket NO. 12-035-100

June 12, 2013

Dear Utah Public Service Commission:

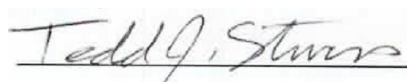
As representatives of Utah's business community, we submit the following comments on Docket No. 12-035-100 on Avoided Costs. We appreciate the opportunity to provide input on this matter. As Utah's population and economy continue to grow, we consider it prudent to pursue opportunities to balance our energy portfolio and provide price certainty and a hedge against increasing risks inherent to the energy sector. Specifically, we consider renewable energy to be an important resource that provides risk-mitigation benefits, both in the near-term as well as the long-term. As such, we believe that decisions impacting the development of renewable energy should be made with an eye to both time horizons.

The avoided cost docket under consideration by the Commission has the potential to significantly impact current and future development of small, independent renewable power production facilities in Utah. In order to encourage renewable energy production and ensure ratepayers are able to benefit from the unique attributes of renewable energy, we want to ensure that avoided cost docket fairly compensates renewable generation for the costs it allows us, as ratepayers and citizens, to avoid: costs associated with fuel price volatility, costs associated with environmental regulation of the energy sector, and costs tied to the increasing frequency of climate change-related events.

We encourage the Commission to consider the following suggestions in making the determination on this issue. First, we think the QF pricing method should appropriately value and pay for the system reliability or 'capacity value' benefits of renewable resources. Second, we believe it is prudent to provide renewable QFs with a capacity credit beginning the first year of operation, because they provide capacity value to a system that is heavily reliant on market purchases in peak summer months. Third, QF projects should be allowed to retain all of the Renewable Energy Credits (RECs) associated with their electricity, unless those QFs are compensated adequately for their environmental attributes. Ultimately, we support a QF pricing methodology that takes into account the real value of renewable energy for ratepayers.

We hope the Commission provides an opportunity for a public hearing on this docket; we see the value in allowing interested citizens and businesses to weigh in on these important issues. We appreciate the opportunity to provide these comments, and we look forward to the opportunity to remain engaged on this important matter going forward.

Sincerely,



Todd Stevens

Managing Director, RenewableTech Ventures

(Signed and submitted to the Utah Public Service Commission for Docket 12-035-100 with permission and on behalf of the businesses listed below)

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