

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

From: Renewable Energy Businesses
Subject: Comments on Docket NO. 12-035-100

June 12, 2013

Dear Utah Public Service Commission:

On behalf of the undersigned renewable energy businesses, we are grateful for the opportunity to provide input on the matter of Docket No. 12-035-100 regarding avoided costs pricing for large renewable energy qualifying facilities.

Utah's rising energy needs, coupled with increased demand for clean energy resources, present unique economic opportunities for businesses to invest in the development of clean energy projects throughout Utah. Independent renewable energy power facilities not only help diversify Utah's energy portfolio, but allow Utah to seize new job growth opportunities and expanded economic competitiveness for Utah's economy.

The Commission's forthcoming avoided costs pricing determination will play a critical role in the potential development of renewable power in Utah. In order to facilitate the development of small, independent power production in Utah, it is important that avoided cost pricing properly value the benefits that renewable energy brings to Rocky Mountain Power and its ratepayers. The current docket is particularly timely because Utah's renewable energy industry has a limited window of opportunity to utilize the renewable energy tax credit before it expires.

Renewable energy provides an opportunity to meet Utah's expanding energy demand in a clean and sustainable manner while creating new, local economic opportunities. These opportunities are dependent on fair valuation of renewable energy and capacity. In order to ensure fair avoided costs pricing for renewable energy qualifying facilities, we ask that the Public Service Commission provide fair and full compensation for the physical capacity value provided by Utah renewable resources—physical capacity that contributes to Rocky Mountain Power's planning reserve margin in a resource portfolio dominated by market purchases. Additionally, we ask that the Commission appropriately compensate renewable qualifying facilities for the volatile and rising energy costs that renewable energy enables Rocky Mountain Power and its ratepayers to avoid for 20 to 25 years. Additionally, we ask that renewable energy developers are allowed either to retain the renewable energy credits (RECs) created from their projects or be compensated fairly for them. Finally, we ask that the Commission consider the significant local economic benefits afforded by Utah-based renewable energy facilities. Utahns could benefit enormously from avoided cost pricing that encourages the development of home-grown, clean, and renewable energy.

Thank you for the opportunity to weigh in on this important issue. Utah's renewable energy industry is eager to invest in further clean energy development in Utah. We look forward to a continued dialogue on Utah's energy future.

Sincerely,

On behalf of these renewable energy business representatives:

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