



INTERMOUNTAIN
UTAH PUBLIC
SERVICE COMMISSION



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

September 16, 2014

Re: Comments on Docket No. 14-035-T04

Dear Utah Public Service Commission:

As representatives of Utah's business community, we submit the following comments on Docket No. 14-035-T04 (In the Matter of Rocky Mountain Power's Proposed Revisions to Electric Service Schedule No. 37, Avoided Cost purchases from Qualifying Facilities). 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 energy sector risks. 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 carefully, with regard to the future wellbeing of Rocky Mountain Power's ratepayers.

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 that ratepayers are able to benefit from the unique attributes of renewable energy, we want to make certain that avoided cost pricing fairly compensates and encourages qualifying renewable generation.

As ratepayers, we are concerned about Rocky Mountain Power's investment decisions and clear undervaluation of renewable energy resources. Furthermore, we are very concerned that the Division of Public Utilities and the Office of Consumer Services are not representing our long-term

interests in this matter. Rather, our utility regulators seem to be forsaking relevant considerations for the sake of achieving some unreasonably low avoided cost price that will prevent renewable qualifying facility development in Utah. We are concerned that our utility regulators are preventing us and all ratepayers from realizing the benefits that clean, fuel free resources provide. We support energy resource diversity as a risk mitigation strategy and view draconian reductions to avoided cost prices as a threat to Utah's long term best interests.

Again, we appreciate the opportunity to comment on this matter. It is our sincere hope that the Commission will consider the long term implications of your decision in this matter.

Sincerely,

(Signed and submitted to the Utah Public Service Commission for Docket 14-035-T04 with permission and on behalf of the businesses listed below)

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Charlottesville, VA 22902

Navitus Renewable Energy
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Salt Lake City, Utah 84121

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Ormat Technologies, Inc.
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Coldwell Banker Commercial
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Powdr Corp
1790 Bonanza Drive, Suite W-201
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Hunt Electric, Inc.
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Solar Utah, Inc.
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