



August 9, 2016

ATTN: The Public Service Commission of Utah

RE: Docket No. 16-035-T09 Recommendations for Schedule 34 tariff

Dear Commissioners:

On behalf of the undersigned businesses, we are grateful for the opportunity to provide comments for your consideration in the development of a fair tariff to implement the renewable energy provisions in SB 115. We represent a variety of interests including businesses with a large enough energy load to utilize this tariff, renewable energy developers, as well as other businesses that support opportunities such as these to incorporate more clean energy into Utah's electricity mix.

The evidence and impacts of climate change continue to mount. Unfortunately, Utah's current electricity supply does not address this issue. While we understand that it will take time to transition our energy supply, businesses can take a leadership role today in diversifying our energy resources. Businesses nationally and locally are adopting specific renewable energy goals for their facilities. A workable renewable energy tariff is vital for businesses to do their part to drive renewable energy solutions, and meet corporate clean energy and climate commitments.

With respect to the Schedule 34 tariff, we request that the Commission consider a few fair and practical provisions that will enable businesses to execute renewable energy contracts pursuant to SB 115, while addressing ratepayer fairness concerns:

1. Do not limit access to the "different methodology" pricing to new load. As proposed by Rocky Mountain Power, Schedule 34 allows only new businesses or businesses with new electricity needs access to alternative pricing options for renewable energy contracts. The language limiting that use of a different methodology to new customers and new load is not a condition of the enabling statute. Businesses with an existing presence in Utah should have the opportunity for alternative pricing method, just as new businesses have this opportunity. As a means of ensuring these contracts are fair and in the public interest, we support Commission approval of contracts developed using different methodologies.
2. The tariff should have fair and reasonable administrative fees, supported by evidence and sound rationale, and should take into consideration best billing practices. The proposed administrative fees are extremely high for customers who must combine meters in order to meet the five-megawatt load threshold.

3. Customers purchasing off-site renewable energy should not be subject to the energy balancing account (EBA) adjustment rate schedule. Investments in renewable energy are free from fuel volatility and environmental regulatory costs. We request the tariff include a provision similar to one for customers utilizing the Subscriber Solar Program, exempting them from the EBA adjustment for the renewable energy purchased under this tariff.

Thank you for your consideration of these comments.

Respectfully, the undersigned business representatives:

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