

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF COLORADO

IN THE MATTER OF THE INVESTIGATION OF )  
REGULATORY AND RATE INCENTIVES FOR ) DOCKET NO. 08I-420EG  
CUSTOMERS OF GAS AND ELECTRIC UTILITIES )

INITIAL COMMENTS OF COLORADO WORKING LANDSCAPES  
AND ROCKY MOUNTAIN FARMERS UNION

Rocky Mountain Farmers Union (RMFU) and Colorado Working Landscapes (CWL), through the undersigned counsel and directly, wish to participate in certain aspects of the captioned docket. Specifically, RMFU and CWL are concerned with the allocation of demand and energy charges for agricultural applications, including through Public Service Company's Secondary General (SG) rate. Some solar producers in rural areas have been severely affected by the demand rates, and we believe the Commission should consider, in this docket, whether other rate structures are more appropriate. RMFU and CWL have held initial discussions with various groups to develop alternatives, but need additional work to develop our proposals. We will file additional comments, or participate in workshops and other proceedings, as these discussions progress.

WHEREFORE, Rocky Mountain Farmers Union and Colorado Working Landscapes state their intention to participate in this docket.

Dated: November 3, 2008

Respectfully submitted,

\_\_\_\_//Charles Holum//\_\_\_\_\_  
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Landscapes

CERTIFICATE OF SERVICE

I hereby certify that on this 31<sup>st</sup> day of October, 2008, I faxed a copy of these comments to the Commission, and will deliver the original and three to the Commission on the next business day, November 3, 2008.

\_\_\_\_//Charles Holum//\_\_\_\_\_  
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