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Department of Commerce

Division of Public Utilities

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ACTION REQUEST RESPONSE

To: Utah Public Service Commission

From: Division of Public Utilities
Chris Parker, Director
Energy Section
Artie Powell, Manager
Abdinasir Abdulle, Technical Consultant
Carolyn Roll, Utility Analyst

Date: November 5, 2012

Re: Docket No. 12-035-87 - Rocky Mountain Power's Customer Owned Generation and Net Metering Report; Cross Reference Docket 08-035-T04; R746-312-16. Division's Review and Recommendation – Acknowledge.

RECOMMENDATION (Acknowledge)

The Division of Public Utilities (Division) has reviewed the Rocky Mountain Power's (RMP or Company) Revised Net Metering Report for the annualized billing period ending March 31, 2012, and finds that it meets the Utah Public Service Commission's (Commission) reporting requirements. The Division finds no outstanding issues at this time and recommends that the Commission acknowledge the Company's report. No further action is necessary at this time.

ISSUE

On June 28, 2012, Rocky Mountain Power filed with the Commission its Net Metering Report for the annualized billing period ending March 31, 2012. The Commission issued an Action Request to the Division on July 3, 2011, requesting an "Explanation and Statement of Issues to

be Addressed.” On August 16, 2012 the Division submitted its memorandum recommending that the Commission acknowledge the report as filed by the Company. The Commission issued an Amended Action Request to the Division on August 30, 2012 for further review for compliance and recommendations. On September 21, 2012 the Division submitted its memorandum recommending that the Company file a revised Customer Generation Report to meet the Commission’s reporting requirements. On October 15, 2012, Rocky Mountain Power filed with the Commission its Revised Net Metering Report. This memorandum constitutes the DPU’s response to the Amended Action Request.

DISCUSSION

In compliance with the Commission’s reporting requirements, the Company filed its Revised Net Metering Report on October 15, 2012, for the period April 1, 2011 through March 31, 2012.

In its Order dated November 30, 2010 in Docket Nos. 10-035-58, 08-035-T04, and 08-035-78, the Commission ordered,

The reporting requirements contained in R746-312[-16] supercede and replace the Company’s net metering reporting requirements in Docket Nos. 08-035-T04 and 08-035-78 with the following exceptions and clarifications:

- a) All net metering interconnections must be noted in the annual report filed pursuant to the Rule;
- b) The information required by R746-312-16(2)(a) is the same cumulative information as provided in Attachment A of the Company’s 2010 Report with the addition of the zip code, year of installation, and notation if the interconnection is a net metered resource;
- c) The Company’s annual report filed pursuant to the Rule should provide all of the data required by the Rule through the end of the annualized billing period of the year the report is being submitted unless otherwise approved; and
- d) The Company is required to report information on the amount

of net metering installed capacity relative to its net metering cap and any [unforeseen] problems or barriers in the tariff in its annual report filed pursuant to the Rule.

The reporting requirements contained in R746-312-16, Public Utility Maps, Records and Reports, states,

- (1) Each public utility shall maintain current records of interconnection customer generating facilities showing size, location, generator type, and date of interconnection authorization.
- (2) By July 1 of each year, the public utility shall submit to the commission an annual report with the following summary information for the previous calendar year:
 - (a) the total number of generating facilities approved and their associated attributes including resource type, generating capacity, and zip code of generating facility location,
 - (b) the total rated generating capacity of generating facilities by resource type.
 - (c) for net metering interconnections, the total net excess generation kilowatt-hours received from interconnection customers by month.
 - (d) for net metering interconnections, the total amount of excess generation credits in kilowatt hours, and their associated dollar value, which have expired at the end of each annualized billing period.

The Division has reviewed the Company's report and finds that it complies with the Commission's reporting requirements for the Net Metering Program. The Division recommended that the Company add summary tables (in addition to the current tables that show the previous 12 months ending March 31 of the current year) to the Company Generation Report that shows the Net Metering Facilities by Resource Type and Net Metering Generation Capacity by Resource Type for the previous calendar year. These tables were included in the revised Customer Generation Report that the Company filed on October 12, 2012.

The Division notes that for the reporting period, there were 405 new net metering facilities, a 48% increase over facilities as of March 31, 2011. Of these new installations, 391, or 96.5% (=391/405) were solar projects. The installed capacity increased by approximately 87.8% over the previous 12 months, of which 93.1% was from solar projects. As of March 31, 2012, the total enrolled capacity is approximately 5581 kW, which is about 0.6% of the program cap of 923,000 kW. The Company reports no unforeseen problems or barriers at this time.

CONCLUSION

The Division believes the Company's Revised Net Metering Report meets the Commission's reporting requirements and sees no issues that need addressing at this time. Therefore, the Division recommends that the Commission acknowledge the Company's Revised Net Metering Report.

CC: Michele Beck, OCS
Dave Taylor, RMP
Service List