- BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

In the Matter of the Investigation of the Costs and Benefits of PacifiCorp's Net Metering Program	DOCKET NO. 14-035-114 ORDER

ISSUED: November 10, 2015

1. PROCEDURAL HISTORY

This Order constitutes a further step toward fulfilling the task the Legislature set for the Commission in Utah Code Ann. § 54-15-105.1. The statute requires us to:

> (1) determine, after appropriate notice and opportunity for public comment, whether costs that the electrical corporation or other customers will incur from a net metering program will exceed the benefits of the net metering program, or whether the benefits of the net metering program will exceed the costs; and
>
> (2) determine a just and reasonable charge, credit, or ratemaking structure, including new or existing tariffs, in light of the costs and benefits.

Utah Code Ann. § 54-15-105.1 (hereafter we refer to § 54-15-105.1(1) as "Subsection One" and § 54-15-105.1(2) as "Subsection Two" and to them collectively as the "Statute").

On August 29, 2014, we opened this docket to examine the costs and benefits of PacifiCorp dba Rocky Mountain Power's ("PacifiCorp") net metering program under Subsection One. In November 2014, we acknowledged the necessity of conducting the Subsection One analysis in steps and stated "[i]n the next step, we intend to establish the appropriate analytical framework for making the required determinations…." (November 21, 2014 Notices of Comment Period and Scheduling Conference at 2.) We explained "[i]n a further phase of this docket, a general rate case or other appropriate proceeding, [we] will examine the costs and benefits that result from applying data to the approved analytical framework." (*Id.*)

On July 1, 2015, we issued our Order Re: Conclusions of Law on Statutory Interpretation and Order Denying Motion to Strike ("July Order"), making conclusions of law with respect to certain preliminary questions the parties posed. The July Order concluded the Statute requires us to analyze those costs and benefits arising out of the net metering program that affect PacifiCorp's cost of service. (July Order at 15.)

Subsequently, PacifiCorp, the Division of Public Utilities ("Division") and the Office of Consumer Services ("Office") submitted written direct testimony, each proposing a framework for assessing the costs and benefits of net metering under Subsection One. Additionally, Sierra Club, Utah Clean Energy and The Alliance for Solar Choice collectively submitted direct testimony as the "Joint Parties," proposing a framework for us to consider. We received written rebuttal testimony from all of these parties and from Vivint Solar, Inc. and Salt Lake City Corporation. All of the foregoing parties with the exception of Salt Lake City Corporation submitted written surrebuttal testimony.

On October 6, 2015, we held a hearing and heard testimony from all of the parties that submitted any form of written testimony. We also heard unsworn argument from those individual intervenors who collectively identify themselves as Utah Citizens Advocating Renewable Energy ("UCARE"). On October 8, 2015, we conducted a public witness hearing and heard from 33 members of the public, nearly all of whom elected to provide their comments under oath, including a representative from UCARE.

Based on the extensive written testimony and evidence submitted in this docket, the evidence heard at the October 6, 2015 hearing, and the public comments we received at the

October 8, 2015 public witness hearing, this Order establishes an analytical framework for assessing the costs and benefits of net metering to fulfill the mandate under Subsection One.

2. DISCUSSION, FINDINGS AND CONCLUSION

As preamble, we express our appreciation for the significant public engagement in this docket. More than 30 individuals appeared to offer comment or testimony at the public witness hearing, and we received a voluminous number of emails from the public concerning this matter. The majority of these public comments expressed a desire to support and promote distributed solar generation, many such comments coming from individuals who have invested in solar panels on their own homes. According to PacifiCorp's most recently filed Customer Owned Generation and Net Metering Report, it has approximately 4,000 net metering customers. These net metering customers represent a little less than ½ of one percent of PacifiCorp's total customers. The interests of this small but growing contingent of customers were commendably and capably represented in this proceeding through both direct public participation and by the Joint Parties, Vivint Solar, Inc., Salt Lake City Corporation and UCARE who intervened and provided testimony to emphasize the benefits of net metering. Of course, we also must consider the interests of the 99.5 percent of PacifiCorp's customers who do not participate in net metering. In this proceeding, as in most, the task of representing these customers' interests largely fell to two state agencies, the Division and the Office, both charged in some manner with promoting the public's interest in safe, reliable and equitably priced utility service.[1] The Division

[1] The Division's objectives are codified in statute and include promoting the "safe, healthy, economic, efficient, and reliable operation of all public utilities" and "fair apportionment of the total cost of service among customer categories and individual customers …." Utah Code Ann. § 54-4a-6. The Legislature created the Office for the express purpose of assessing potential impacts of utility rate changes and other regulatory actions on residential consumers and small commercial customers. *See* Utah Code Ann. § 54-10a-301.

and the Office clearly put considerable time and effort into formulating proposed frameworks for us to consider. Finally, the responsibility for operating an electric utility that is adaptive to new technologies but remains reliable and equitable falls to PacifiCorp, and we appreciate the significant amount of work it has performed in this docket.

We believe the parties' collective efforts have resulted in a record that supports our adoption of a general framework. We did not anticipate the evidence adduced at the October 6 hearing would be sufficient to support an order that comprehensively identifies all conceivable benefits and costs of net metering, and we recognize the framework we outline below leaves some details unspecified. This appears consistent with the parties' expectations. (*See, e.g.*, R. Davis Direct Test. at 8:124-128 ("Further details of how the studies are to be conducted and what costs and benefits to include can be determined once the Commission makes a final decision on the framework. Such an approach will necessitate more decisions about how to construct the studies and properly identify costs assignable to the specific group of customers.")

While some issues remain to be resolved, we find the record supports our adoption of the general framework set forth below. We believe this framework captures the Legislature's intent in enacting Subsection One and that it will provide essential information when we commence our work under Subsection Two.

2.1. The Division's Recommendation to Compare PacifiCorp's Actual Cost of Service to the Cost of Service that Would Exist but for Net Metering Customers' Self-Generation is Well Suited to Assessing the Cost Impacts of Net Metering under Subsection One.

The Division recommends we require a comparison between two separate cost of service studies to determine the costs and benefits of the net metering program. (*See, e.g.*, R. Davis

Direct Test. at 6:102-103.) One study creates a counterfactual scenario that assumes away the existence of net metering customers' power generation, meaning PacifiCorp must meet net metering customers' full load and these customers push no energy back to the grid. (*See*, *e.g.*, *id* at 7:106-112.) We refer to this study as the "counterfactual cost of service study" or "CFCOS."

The second cost of service study, which we refer to as the "actual cost of service study" or "ACOS," should reflect PacifiCorp's actual cost of service inclusive of net metering customers' participation. Under this scenario, PacifiCorp meets only net metering customers' "net load" (*i.e.*, net metering customers' total consumption less the amount they self-generate) and the model includes the excess energy net metering customers push to the grid. (*See, e.g.*, *id.* at 7:115-116.) The Office is generally supportive of the Division's approach. (P. Hayet Rebuttal Test. at 3:50-56.)

In written rebuttal testimony, PacifiCorp expressed concern whether sufficient data exists to construct the CFCOS. (J. Steward Rebuttal Test. at 3:63-4:80.) PacifiCorp explained that to determine what net metering customers' full load would be in the absence of their self-generation, PacifiCorp needs to know not only how much utility-supplied energy these customers use but also how much energy they produce and consume themselves. (*Id.*) PacifiCorp questioned whether a sufficient number of net metering customers had agreed to have production meters installed to measure the latter. (*Id.*) However, both the Office and the Division concur that with the completion of PacifiCorp's pending load study, sufficient data should be available. (P. Hayet Surrebuttal Test. 5:100-106; Hr'g Tr. at 195:12-20.) Additionally, at hearing, PacifiCorp conceded its research staff believes enough production meters have been installed to create "a defensible production profile." (Hr'g Tr. at 273:22-24.)

While some disagreement exists about how net metering customers' excess generation should be treated and PacifiCorp believes one cost of service study is sufficient, we weigh heavily the fact that unanimity exists among the Division, the Office and PacifiCorp that the established cost of service models provide the proper platform for conducting the cost benefit analysis. (*See, e.g.,* P. Hayet Surrebuttal Test. at 2:37-40 (noting that the Division's proposal is similar to the Office's and "could be adopted as well"); P. Clements Rebuttal Test. at 26:550-52 (noting PacifiCorp, the Office and the Division rely on "[PacifiCorp's] established cost of service model as the basis for the cost benefit analysis.").)

We adopt the Division's proposal as more specifically outlined in the sections that follow.

2.2. The Division's Proposal will More Comprehensively Capture the Cost Impacts of Net Metering than a Single Class Cost of Service Study because It Will Identify Impacts at the System, State and Customer Class Levels.

PacifiCorp proposes a framework that uses one class cost of service study to evaluate the costs and benefits of net metering. (P. Clement, Surrebuttal Test. at 9:181-184.) PacifiCorp's framework creates a new class consisting of net metering customers. Based on the net metering customer usage characteristics (primarily demand, energy or customer related), PacifiCorp's class cost of service study allocates a share of Utah jurisdictional costs to that new class. (J. Steward Direct Test. 2:44-3:48, 3:60-65.) PacifiCorp asserts that "[w]hile using similar tools [to the Division's proposal] … [PacifiCorp's] proposed approach … will more effectively and efficiently accomplish the goal of identifying the costs and benefits of NEM customers, without the need for relying on estimated data to approximate a full requirements customer or the complexities of preparing a second revenue requirement." (J. Steward Rebuttal Test. at 2:37-43.)

Although we acknowledge PacifiCorp's desire for simplicity, the evidence presented suggests PacifiCorp's proposal will not fully capture benefits and costs associated with the net metering program. Specifically, PacifiCorp's proposal does not capture and identify impacts net metering customers have on the system. Rather, PacifiCorp's proposal takes Utah's revenue requirement as a given. PacifiCorp's witness conceded this point at hearing:

> Q: [I]f [the net metering program] reduced the whole revenue requirement for all customers … that's not something that you would see in [PacifiCorp's] cost-of-service study?
>
> A: Correct.

(Hr'g Tr. 255:22-256:1; *see also* R. Davis Rebuttal Test. at 2:39-3:41("[I]t is not clear how [PacifiCorp's] framework would demonstrate the benefits to Utah through the inter-jurisdictional allocations without running alternative scenarios.").)

We find the Division's proposal to be more consistent with our legislative mandate to assess the costs and benefits associated with net metering and our July Order concluding this process should identify the impact net metering customers have on PacifiCorp's cost of service. Accordingly, we adopt the Division's proposal and conclude the framework to be employed in Subsection One will consist of two separate cost of service studies: CFCOS and ACOS. Further, the CFCOS and ACOS should be prepared to reflect the impacts of net metering at the system level, state level and customer level (as outlined under subsection 2.5 of this order).

2.3. <u>The CFCOS and ACOS Should be Commensurate with the Test Period in PacifiCorp's Next General Rate Case.</u>

The Division, the Office and PacifiCorp agree we should adopt a framework that analyzes the costs and benefits of the net metering program over a one-year period that is commensurate with the test period PacifiCorp relies on in its next general rate case. (*See, e.g.*, P. Clements Rebuttal Test. at 4:75-77 ("I agree with the OCS' conclusion that a short-term study period that coincides with the period used for ratemaking [commonly known as the 'test period'] is appropriate for the NEM cost-benefit analysis"); Hr'g Tr. at 193:17-194:8.)

We concur. While our July Order made clear our discretion in rate setting is not relevant to the cost-benefit analysis the Legislature has tasked us to perform under Subsection One, the parties are correct to emphasize that, ultimately, the results of the Subsection One analysis will be used to design rates. (*See, e.g.*, A. Powell Surrebuttal Test. at 7:135-138; R. Davis Rebuttal Test. at 1:15-16.) The results of the Subsection One analysis must leave us well poised to "determine a just and reasonable charge, credit, or ratemaking structure" under Subsection Two. It is, therefore, eminently sensible to rely on the same test period data employed to establish all customers' rates. We are persuaded that relying on the rate case test period is consistent with the Statute and will yield useful results in the rate setting context.[2]

2.4. **The ACOS Should Not Impose a Value on Net Metering Customers' Excess Generation from Schedule 37.**

Some confusion in the record exists with respect to how net metering customers' excess generation should be treated under the Division's proposal. In his rebuttal testimony, PacifiCorp witness Paul Clements testified the Division's proposal includes "excess NEM energy in the cost of service model, which essentially values it at embedded cost" and asserted "[e]xcess NEM energy should be valued at avoided costs and not at embedded costs." (P. Clements Rebuttal

[2] We are mindful of the Joint Parties' proposal to use a different period of analysis, which we address *infra* at pp. 13-15.

Test. at 26:554-27:557.) At hearing, Robert Davis testified the Division supported reimbursing net metering customers for their excess generation at avoided cost rates as established in Schedule 37. (Hr'g Tr. at 180:1-12, 182:13-184:1.) The Office appears to concur that net metering customers' excess generation should be valued at avoided costs as established under existing schedules. (P. Hayet Rebuttal Test. at 4:74-78.)

We understand the point of preparing a CFCOS and comparing it to the ACOS is to obtain a picture of the utility's costs with and without the participation of net metering customers. It is not necessary at the cost modeling stage to rely on another tariff to impose a value on the net metering customers' excess generation. Rather, we expect the ACOS will capture any cost impacts associated with excess energy net metering customers provide to the system. In preparing the ACOS, PacifiCorp should not assign a price or value to the net metering customers' excess energy other than as recognized in the net power cost analysis. We will consider issues related to how net metering customers should be credited or compensated for their excess energy when we take up the Statute's rate setting implications under Subsection Two.

2.5. The CFCOS and ACOS Should Reflect Impacts at the System, State and Customer Levels, and the ACOS Should Provide Two Separate Evaluations at the Customer Level, One in which Net Metering Customers are Included in their Existing Class and Another Wherein Net Metering Customers are Allocated Costs as a Separate Customer Class According to Their Usage Characteristics.

At the highest (*i.e.* system) level, the two cost of service studies performed under the framework we adopt here should reveal the cost impacts of net metering to the utility. Subsection One also requires the Commission to analyze the costs and benefits to the utility's non-net metering customers, which is why it will be essential for the CFCOS and ACOS to show the impacts at the system, state and customer class level. (*See*, *e.g.*, Hr'g Tr. at 193:2-10 (Dr. Powell testifying that the Division's proposal will capture impacts at the system, jurisdictional and class levels).) The impact to PacifiCorp's non-net metering customers will only be fully recognized by analyzing the difference in costs of service that must be allocated at the customer class level, and ascertaining the effect on Utah's jurisdictional allocation of the utility's system costs is a necessary intermediary step.

Comparing the cost of service for the existing classes under the ACOS and CFCOS will show both the total and average cost impact on the existing classes, and this information will be valuable in assessing a just and reasonable rate structure. However, as the parties have pointed out for the residential class, a potential for intraclass subsidy exists because PacifiCorp recovers most of its fixed costs through energy rates, and net metering customers are expected to use less energy than other residential customers. The magnitude of this subsidy, if it exists, will not be readily apparent if the analysis does not "drill down" another level and separately allocate costs to net metering customers based on their usage characteristics. Analyzing costs at the customer class level ensures the cost to serve the net metering customers is also recognized. (*See* Hr'g Tr. at 123:22-25 (P. Hayet testifying "to evaluate the impacts of lost revenues, it's important to identify impacts on net metering and non-net metering customers separately in the cost-benefit analysis.").)

PacifiCorp represents "[u]sing data from the load research study that is currently underway, [PacifiCorp] will be able to create a class profile for residential NEM customers, in the same manner done for other types of customer classes" and "[t]his will enable [PacifiCorp] to assign costs to the NEM customers based on how they use the utility system." (J. Steward Direct

Test. at 3:61-65.) PacifiCorp testifies that "[c]reating a separate class will allow for a more refined determination on how NEM customers with distributed generation influence each element of cost of service (generation, transmission, distribution, [and] retail)." (*Id.* at 6:105-107.) The Division appears to agree this information will be useful. (*See* R. Davis Rebuttal Test. at 3:44-47 ("The Division does not object to having a separate class for residential net metering customers as this would likely solve the cost causation and mitigate cross subsidization issues within the current single residential class.").)

Accordingly, when allocating Utah's jurisdictional cost of service to customer classes under the ACOS, PacifiCorp should provide two scenarios for the allocation of costs at the class level: (1) a scenario wherein the class includes net metering customers that are otherwise participants in the class and (2) a scenario wherein the net metering and non-net metering customers are segregated into two new classes and costs are separately allocated based on their respective usage characteristics. Comparing the first scenario with the cost of service allocated to the class under the CFCOS should prove illustrative of the net total and average impact net metering customers bring to the particular class. Whereas comparing the segregated classes will allow the parties and the Commission to assess whether non-net metering customers are subsidizing net metering customers under the extant rate structure and to compare the magnitude of any subsidy to the total benefit (or cost) net metering customers bring to the class.

To be clear, the Commission is not here concluding that a new rate class should be instituted for net metering customers. However, we believe segregating the customer classes for, at least, these limited analytical purposes will prove instructive in rate setting and is consistent with our duties under the Statute.

2.6. <u>The Record Does Not Support an Order that Comprehensively Identifies the Categories of Costs and Benefits of Net Metering, but Both Cost of Service Studies Should Contain the Categories of Costs that Typically Comprise Such Studies and Should Be Supplemented by Any Additional Costs or Benefits that Will be Realized in the Test Period.</u>

We agree with the Division that "[t]he difference in the [ACOS and CFCOS] should reveal to a great degree the benefits net metering customers bring to the system through a reduction in costs." (R. Davis Direct Test. at 3:40-42.) However, we are cognizant of the Division's concern other costs and benefits may exist that will not necessarily be captured using PacifiCorp's traditional cost of service apparatus. (*See, e.g.*, Hr'g Tr. at 167:10-13.) The Division contemplates such costs or benefits might be independently assessed and used to supplement the cost of service studies. (*See id.*)

The record before us does not support our issuing an order that comprehensively identifies the categories of costs and benefits to be included in the ACOS and CFCOS or any categories of costs or benefits that should be used to supplement the results of those studies. We recognize the inherent difficulty of creating a counterfactual cost of service study, and expect PacifiCorp and the parties to use their best efforts in assessing what PacifiCorp's cost of service over the rate case test period would be in the absence of the energy net metering customers produce. We further expect the costs in the CFCOS that are not present in the ACOS will reflect benefits associated with net metering. Costs associated with net metering, such as net metering program administration and integration costs, will be included in the ACOS but omitted from the CFCOS.

We recognize that we may have to address disagreements about the existence or magnitude of one or more such effects in a future proceeding. At this juncture, we adopt the

Division's proposed framework of developing the ACOS or CFCOS over the next general rate case test period to serve as the basis for evaluating the costs and benefits attendant to net metering. The categories of costs in both studies should generally be consistent with those PacifiCorp employs in preparing cost of service studies for ratemaking purposes. To the extent any party believes a cost impact of net metering should be included in one of the studies or used to supplement the result of a study, the party bears the burden to demonstrate the existence of the impact and that it will be (or has been) realized in the test period.

2.7. Net Metering Customers' Generation Equipment is Not a "System Resource" and the Joint Parties' Proposal to Evaluate It as Though It Were Is Not Consistent with the Statute.

The Joint Parties' proposal is largely predicated on the notion that net metering customers' generation equipment constitutes "a free resource to the utility system" and therefore assessing the costs and benefits of net metering is analogous to the analysis PacifiCorp employs in its integrated resource planning. (T. Woolf Direct Test. at 5:89-90; *see also* T. Woolf Rebuttal Test. at 7:132-137.) We reject this premise.

Net metering generation results from a voluntary customer decision. As the Division noted, "[PacifiCorp] has little if any control over the design of systems on the customer side of the meter." (R. Davis Rebuttal Test. at 7:130-31.) The customers own and control their equipment, and customers make decisions about whether to install that equipment and how much capacity to install. The customer is under no obligation to maintain the system or to supply the utility with electricity. If a problem develops that prevents the customer from generating energy, the customer is under no obligation to cure it. More significantly, a customer is under no contractual obligation to provide any of the power it generates to the utility. Net metering customers may elect, at any time, to use their electricity however they choose. (*See generally* R. Davis Rebuttal Test. at 10:189-193; Hr'g Tr. at 215:20-216:6 (P. Clements testifying that "[u]nder most of [PacifiCorp's qualifying facility agreements, it has] robust credit terms, robust performance guarantees, step-in rights, other credit provisions that ensure that [the] project will be producing … [and no] such protections exist with a rooftop solar or net metering customer.").)

The Joint Parties' proposal asks us to adopt a framework that treats customer-owned and controlled equipment as a system resource, requiring speculation about the cost impacts of these customer owned and controlled assets decades into the future and assigning a present value to impacts that, even if they come to fruition, are not projected to materialize for many years.

We do not find this approach to be consistent with the Statute. The Division is correct to emphasize the framework we adopt for the Subsection One analysis must be useful for rate setting under Subsection Two. (R. Davis Rebuttal Test. at 10:181-183.) Subsection One instructs us to assess the impact of net metering on the utility and its "other customers." Those who are present customers of PacifiCorp may or may not be customers in two decades. We believe the Legislature was careful to include the term "other customers" in Subsection One because it was concerned about the near term impact net metering has on the utility's other *current* customers. (*See*, *e.g.*, Hr'g Tr. at 92:20-22 (P. Hayet testifying in support of using the test period for assessing the costs and benefits of net metering because it "helps to avoid intergenerational inequity and is more reflective of the time horizon used to set rates.").[3]

We understand PacifiCorp forecasts distributed generation penetration in connection with preparing its integrated resource plan ("IRP"). PacifiCorp's IRP provides its regulators with information concerning how PacifiCorp intends to meet its obligations to its customers over the next two decades. By necessity, this process requires long-term forecasting of loads and the effect distributed generation and other energy sector developments may have on PacifiCorp's system. However, the Legislature has tasked us with evaluating the costs and benefits of net metering under Subsection One for the express purpose of determining "a just and reasonable charge, credit, or ratemaking structure" under Subsection Two. Projecting the existence or quantity of distributed generation ten or twenty years from now is not necessary for these purposes and we do not believe the Legislature intended us to do so.

Therefore, we adopt the Division's, PacifiCorp's and the Office's recommendation to assess net metering impacts over the test period utilized in PacifiCorp's next general rate case and decline to adopt the Joint Parties' proposal.

3. ORDER

For the foregoing reasons, we adopt the general framework for assessing costs and benefits of net metering as set forth herein and as set forth in our July Order. No later than the

[3] The Office also testified it "would not object to the evaluation also being performed over a longer term horizon, but for informational purposes, on a one-time basis, not for determining inputs that … will be used for setting rates, charges or credits." (Hr'g Tr. 121:24-122:3.)

date PacifiCorp files its next general rate case, PacifiCorp shall file the following with the Commission:

1. Two cost of service studies as described in this order. In one cost of service study (the "CFCOS"), PacifiCorp will use its best efforts to estimate what its cost of service would be if net metering customers produced no electricity, drawing their entire load from PacifiCorp and providing no surplus energy to the system. The second cost of service study (the "ACOS") should reflect PacifiCorp's actual cost of service with net metering customers' participation, meaning PacifiCorp provides net metering customers with energy only when their self-generation is insufficient to meet their load and net metering customers push any surplus energy they produce to the system.
2. Both the CFCOS and ACOS will reflect costs at the system, state and customer class level.
3. The ACOS will illustrate cost of service in two respects at the customer class level. First, the ACOS will reflect class cost of service with net metering customers included in their existing class. Second, the ACOS will segregate net metering customers from the class in which they presently participate and reflect the resulting class cost of service to the net metering customers as a separate class and show the impact their segregation has on the class in which they would otherwise participate.
4. The period of time covered by each of the cost of service studies shall be commensurate with the test period in PacifiCorp's next general rate case.

DATED at Salt Lake City, Utah, this 10th day of November, 2015.

/s/ Thad LeVar, Chair

/s/ David R. Clark, Commissioner

/s/ Jordan A. White, Commissioner

Attest:

/s/ Gary L. Widerburg
Commission Secretary
DW#270449

CERTIFICATE OF SERVICE

I CERTIFY that on the 10th day of November, 2015, a true and correct copy of the foregoing was delivered upon the following as indicated below:

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