



Salt Lake City, Utah 84111  
October 3, 2014

201 South Main, Suite 2300

***VIA ELECTRONIC FILING  
AND OVERNIGHT DELIVERY***

Utah Public Service Commission  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84114

Attention: Gary Widerburg  
Commission Secretary

RE: Docket No. 14-035-116, In the Matter of the Disposition of Remaining Unused Credits Associated with Excess Customer-Generated Electricity Provided Under Utah Code Ann. § 54-15-104(4)

On September 4, 2014, the Commission issued a Notice of Comment Period inviting interested parties to submit comments regarding the disposition of the unused credits created by customers' excess generation under the Company's net metering program that are relinquished at the end of the annual billing cycle. The Commission states that "In the absence of alternative recommendations, the Commission intends to direct PacifiCorp to allocate the expiring credits to its low-income assistance program..." Per the Commission's notice, comments were due by September 26, 2014, with reply comments due by October 3, 2014.

On September 4, 2014, the Office of Consumer Services (OCS) and Utah Clean Energy (UCE) filed comments supporting the donation of the avoided cost value of the expiring credits to Rocky Mountain Power's low income program. On September 26, 2014, the Division of Public Utilities (DPU) recommended that the value of unused credits be more closely aligned with energy efficiency or renewable energy development and the credit be applied to Rocky Mountain Power's (Company) DSM account balance or to the Blue Sky Program.

Rocky Mountain Power supports the recommendation of the OCS and UCE to donate the avoided cost value of the expiring credits to Rocky Mountain Power's low income program as provided in Utah Code Ann. § 54-15-104(4). Alternatively, the Company does not oppose either of the DPU recommendations. Additionally, the Company agrees with the DPU's position as outlined in their comments that the unused credits should not be returned to customers.

Rocky Mountain Power respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

By E-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)  
[dave.taylor@pacificorp.com](mailto:dave.taylor@pacificorp.com)

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232

Utah Public Service Commission

Docket No. 14-035-116

Page 2

Informal inquiries may be directed to Dave Taylor at (801) 220-2923.

Sincerely,

Jeffrey K. Larsen

Vice President, Regulation & Government Affairs