



State of Utah  
Department of Commerce  
Division of Public Utilities

FRANCINE GIANI  
*Executive Director*

THOMAS BRADY  
*Deputy Director*

CHRIS PARKER  
*Director, Division of Public Utilities*

GARY HERBERT  
*Governor*  
SPENCER J. COX  
*Lieutenant Governor*

## ACTION REQUEST RESPONSE

To: Utah Public Service Commission

From: Utah Division of Public Utilities  
Chris Parker, Director  
Artie Powell, Energy Section Manager  
Carolyn Roll, Utility Analyst

Date: July 8, 2014

Re: Docket No. 14-035-71 - Rocky Mountain Power's Utah Solar Photovoltaic Incentive Program Annual Report for Program Year 2013: Pursuant to Commission Order in Docket No. 11-035-104. Division's Review and Recommendation – Acknowledge with Conditions.

### **RECOMMENDATION (ACKNOWLEDGE WITH CONDITIONS)**

The Division of Public Utilities (Division) has reviewed the Rocky Mountain Power's (RMP or Company) Utah Solar Photovoltaic Incentive Program Annual Report (Report) for the period ending December 31, 2013, and finds that it meets the Public Service Commission of Utah's (Commission) reporting requirements for the data that were available for reporting with some minor reconciliation issues of reported numbers. The Company reported that the generation data for the large non-residential projects were not available due to problems with production meters. The Company is working with those projects to ensure that data are available in future reports. The Division recommends that the Commission acknowledge the Company's initial annual report once the Company reconciles report totals in their reply comments, and requests the Commission direct the Company to include additional data in future reports as discussed in this action request response.

## **ISSUE**

On July 26, 2012, the Commission held a duly-noticed scheduling conference in Docket No. 11-035-104 to set a procedural schedule for processing an application for approval of a new Solar Incentive Program (Program). On August 10, 2012 Rocky Mountain Power filed its application of a Solar Incentive Program and proposed Electric Service Schedules 107 and 195 and requested an effective date of October 12, 2012. As outlined in the Scheduling Order in Docket No. 11-035-104 dated July 27, 2012, comments on the application were due August 29, 2012. The Division filed comments on the application August 29, 2012. On September 12, 2012 the Commission held a hearing on the Application. The Commission issued its Report and Order in docket No. 11-035-104 approving the Solar Incentive Program with an effective date of October 12, 2012. One of the requirements in the order was that the Company file an annual report of the Program. The Company filed with the Commission its Utah Solar Photovoltaic Incentive Program Annual Report for the 2013 program year on June 5, 2014. On June 10, 2014 the Commission issued an Action Request to the Division to review the Report and make recommendations. This memorandum is the Division's response to that request.

## **DISCUSSION**

In its Order dated October 1, 2012 in Docket No. 11-035-104 the Commission ordered,

The Company will file an annual report for each Program year by June 1 of the following year. The Company may propose adjustments to Program parameters to account for, among other things, possible needed changes in the incentive structure and the effects of fluctuations in demand. The Application specifies that any Program adjustments will require Commission approval and will be announced by October 31, preceding the start of the Program.

The Order states that the Company's annual report "shall include but not be limited to: the number of applications, the number and size of completed installations, the total costs of all completed installations, generation data for large systems, and the number, if any, of surrendered deposits."<sup>1</sup> The Report Executive Summary states that "due to the structure of the program, this

---

<sup>1</sup> Docket No. 11-035-104, In the Matter of the Investigation into Extending and Expanding the Solar Incentive Program and Possible Development of an Ongoing Program. Issued October 1, 2012, page 10.

report will not provide all of the information requested by the Commission.”<sup>2</sup> The Report did not provide additional information to specify what information was omitted. This may be a timing issue since 42 of the projects have not completed installation; however the Division requests that the Company provide explanation for the omissions and if this will be an issue in subsequent reports.

The section of the Report summarizing the 2013 results states that 1,359 total applications were submitted, however Table 1 shows 1,433 total 2013 Program Applications. There is another discrepancy in the reported capacity for the Residential sector, the summary states that applications totaling 4,192 kW were submitted, while Table 2 reports Residential capacity received as 4,173 kW. In reviewing the exhibit<sup>3</sup> submitted with the Report, the CSI Rating (kW) AC, totals for Residential and Small Non Residential did not match the totals reported in Table 2 for projects completed as of May 20, 2014. The Division requests that the Company clarify or correct these results in their reply comments.

One requirement in the Report is the inclusion of generation data for large systems. The Company reported that in compiling data for the large non-residential projects problems with the production meters were identified. The Division requests additional explanation of the issues with the production meters, current status, and if the issues have not been resolved, the expected timeline for resolution. It is critical that this issue is resolved since incentives for the Large Non Residential projects are based on system performance.

As a result of our review, the Division requests that additional information be included in future reports. There may also be a need to review the structure and report labels so that the report is more easily understood. Since all projects may not be completed when the report is compiled the Division suggests that the data for previous programs year(s), current program year and cumulative totals be included for all sections of the report. For the System Specific Information (Attachment A) the Division requests the following additions: date deposit was received, date project was completed, date incentive was paid, subtotals for each sector, and grand totals.

---

<sup>2</sup> Utah Solar Incentive Program 2014 Annual Report, page 1.

<sup>3</sup> Utah Solar Incentive Program 2014 Annual Report – Attachment A: System Specific Information, 2013 Completed Projects.

Program costs are tracked in a balancing account, the Division requests that summary entries and account balance be included in future annual reports.

## **CONCLUSION**

The Division requests that the Company provide an explanation of omitted information and reconcile report totals in the report summary to Table 1, Table 2, and Attachment A. Once these conditions are met by the Company in reply comments or an amended report, the Division recommends that the Commission acknowledge the Company's Utah Solar Photovoltaic Incentive Program Annual Report.

The Division is proposing additional information to be included in future annual reports. These include prior year(s) as well as cumulative program data; dates, subtotals and totals to System Specific Information spreadsheet; and the Program's balancing account summary entries and account balance. A meeting with the Company and interested stakeholders may be the most efficient action to address these requested additions and changes to the report.

CC Jeffrey K. Larsen, RMP  
Dave Taylor, RMP  
Michele Beck, OCS  
Service List