



State of Utah  
Department of Commerce  
Division of Public Utilities

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## ACTION REQUEST RESPONSE

To: Utah Public Service Commission

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

Date: July 1, 2015

Re: Docket No. 15-035-57 - Rocky Mountain Power's Utah Solar Photovoltaic Incentive Program Annual Report for Program Year 2014: Pursuant to Commission Order in Docket No. 11-035-104. Division's Review and Recommendation – Acknowledge.

### RECOMMENDATION (ACKNOWLEDGE)

The Division of Public Utilities (Division) has reviewed Rocky Mountain Power's (RMP or Company) Utah Solar Photovoltaic Incentive Program Annual Report (Report) for the period ending December 31, 2014, and finds that it meets the Public Service Commission of Utah's (Commission) reporting requirements for the data that were available for reporting.

### 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 2014 program year on June 1, 2015. On June 1, 2015 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 Company will provide cumulative data and data from each program year in the annual report as the program progresses.

As a result of the Division's 2014 review, the Division requested that additional information be included in future reports. Since all projects may not be completed when the report is compiled the Division suggested 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 requested the following additions: date deposit was received, date project was completed, date incentive was paid, subtotals for each sector, and grand totals.

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<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.

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

The majority of these requests were included in the 2015 report, with the exception of the deposit dates, sector subtotals, and grand totals. The Division request that the Commission direct the Company to schedule a meeting with interested parties to discuss the report and any additional information parties would request for future reports. This would also be an opportunity to discuss the Small Non-Residential sector and the remaining capacity from prior years that has been rolled over to future program years.

The Company will be using the surrendered deposits as an offset to the administrative costs of the program. At the time that it is determined that all projects from a program year are either not being installed or are complete the Company will transfer all surrendered deposits for the program year as a credit to the deferred account. The Division requests that the entry is shown as a separate line item in Table 12 of future reports.

The Company provided the total renewable energy certificates (“RECs”) obtained from projects affiliated with the program. Annual and cumulative totals will be provided. For ease of calculation the Company will begin collecting RECs the first full month after the incentive has been paid to the participant. The calculation will be based on an assumption of 0.023 RECs per month per incentivized kW<sub>CSI-AC</sub>. Columns have been added to Attachment A with the incentive payment date, the assumed monthly REC total, and the total RECs assumed through May 2015.

## **CONCLUSION**

The Division recommends that the Commission acknowledge the Company’s Utah Solar Photovoltaic Incentive Program Annual Report that was filed on June 1, 2015.

The Company included additional information that was requested for annual reports. These items include prior year(s) as well as cumulative program data; dates, the amount of RECs obtained through the Program for that year and cumulatively to System Specific Information spreadsheet; and the Program’s balancing account summary entries and account balance. The Division requests that a meeting be held with interested parties to discuss the report and any program concerns or issues.

CC Jeffrey K. Larsen, RMP  
Bob Lively, RMP  
Michele Beck, OCS