

ACTION REQUEST

Date: August 24, 2016

FROM: Public Service Commission

Due: October 7, 2016*

SUBJECT: Docket No. 16-035-28, Compliance with Commission Requirements, Review for Accuracy of Reported Information

16-035-28

APPLICATION In the Matter of: Rocky Mountain Power's Customer Owned Generation and Net Metering Report and Attachment A for the Period April 1, 2015 through March 31, 2016

This is a request for the Division to provide analysis, evaluation results, and the basis for conclusions and recommendations regarding the following:

- Review for Compliance and Make Recommendations
- Review Application and Make Recommendations
- Analyze the Complaint
- Review Notice and Make Recommendations
- Review Request for Agency Action and Make Recommendations
- Respond in Accordance with the Notice of Filing and Request for Comments
- Investigate
- Other – Explanation and Statement of Issues to be Addressed (See Below):

*In the event the Commission issues an order or notice providing dates for comments and/or testimony in this docket:

- The Division shall respond consistent with the order or notice;
- The order or notice, including any deadlines, shall supersede and replace this action request; and
- This action request shall be deemed withdrawn.

A. In response to the comments filed in this docket on July 29, 2016, on August 12, 2016, PacifiCorp’s reply comments included a modified Attachment A that “includes an additional column reflecting the rate schedule for each net metering service.” The rate schedules presented in the new column (worksheet column B) are: blank, 08NETMT135, 08NMT06135, 08NMT6A135, 08RNM06135, 08NMT08135, 08GNSV008M, 08NMT10135, 08NMT23135 and 08RNM23135. Absent from the modified Attachment A is an explanation of the meaning of the various rate codes.

It appears the rate schedules presented in modified Attachment A could map to the following PacifiCorp rate classes and Electric Service Schedules (ESS).

Table 1. Possible Rate Schedule Definitions

Rate Schedule	Definition
BLANK	Non - Net Metering Customer
08NETMT135	Residential Net Metering Customer, i.e., ESS 1, 2, and 3
08NMT06135	Large Non-Residential Net Metering Customer, i.e., ESS Schedule 6
08NMT6A135	Large Non-Residential Net Metering Customer, i.e., ESS 6A
08RNM06135	Large Non-Residential Net Metering Customer, i.e., ESS 6
08NMT08135	Large Non-Residential Net Metering Customer, i.e., ESS Schedule 8
08GNSV008M	Large Non-Residential Net Metering Customer, i.e., ESS Schedule 8
08NMT10135	Large Non-Residential Net Metering Customer, i.e., Schedule 10
08NMT23135	Small Non-Residential Net Metering Customer, i.e., ESS 23
08RNM23135	Small Non-Residential Net Metering Customer, i.e., ESS 23

- 1) Please verify whether or not, Table 1 correctly defines PacifiCorp’s rate schedules presented in the modified Appendix A. If not, please provide the correct interpretation.
- 2) Please explain the difference between 08NMT08135 and 08GNSV008M.
- 3) Please explain the difference between 08NMT06135 and 08RNM06135.
- 4) Please explain the difference between 08NMT23135 and 08RNM023135.
- 5) Non-Net Metering customers: In the modified Attachment A, 25 “non-Net Metering customers” (i.e., the entry in the column labelled “Net Metering” is “No”) have been assigned the rate schedule of 08NETMT135, one non-Net Metering customer has been assigned the rate schedule of 08NMT23135, and 19 other “non-Net Metering customers” have no rate schedule assigned (i.e., the respective cell in Column B is blank). Please explain why some non-net metering customers have the same rate schedules as net metering

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customers and others do not. If a discrepancy is identified, please provide a corrected spreadsheet.

- 6) Utah Code Annotated 54-15-102(3) and PacifiCorp's Schedule No. 135, Net Metering Service, limit eligible net metering customer generation systems to not more than 25 kilowatts for a residential facility or not more than 2 megawatts for a non-residential facility. In the modified Appendix A, the rate schedule 08NETMT135 is assigned to over 7,500 customers whose system sizes identified in the KW column range from 0 to 1,635 KW. Of these 7,500 customers approximately 250 have a KW rating of greater than 25 kW.
 - a. If the assumption in Table 1 above is correct, i.e., 08NETMT135 represents residential customers, there appears to be a discrepancy in the data as residential customers are limited to systems of 25 KW or less. Please provide a recommendation to correct this discrepancy so that residential customers can be clearly identified in Attachment A.
 - b. If the assumption in Table 1 above is incorrect as identified in the answer to Question 1 above, please provide a recommendation on how Attachment A can be further modified to satisfy the September 24, 2015 order in Docket No. 15-035-64, particularly with respect to identifying residential customers.

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