



GARY HERBERT
Governor
SPENCER J. COX
Lieutenant Governor

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

ACTION REQUEST RESPONSE

To: Utah Public Service Commission

From: Utah Division of Public Utilities
Chris Parker, Director
Energy Section
Artie Powel, Manager
Bob Davis, Utility Analyst
Lori Foster, Utility Analyst

Date: June 9, 2016

Re. 16-035-T07 – In the Matter of Rocky Mountain Power’s Proposed Revisions to Electric Service Schedule No. 135, Net Metering Service.

RECOMMENDATION (Approval)

The Division of Public Utilities (“Division”) recommends the Public Service Commission (“Commission”) approve the Company’s proposed revisions to Schedule 135 effective July 1, 2016. The Division determined that the Company’s filing is in compliance with the Commission Order in Docket No. 08-035-78 dated February 12, 2009.

ISSUE

On May 27, 2016, Rocky Mountain Power (“Company”) filed with the Public Service Commission (“Commission”) its proposed revisions to Electric Service Schedule No. 135, Net Metering Service. The Company requested an effective date of July 1, 2016.

On May 27, 2016, the Commission issued an Action Request to the Division requesting the Division to investigate the Company's filing and make recommendations. The Commission asked the Division to report back by June 13, 2016. This memorandum represents the Division's response to the Commission's Action request.

DISCUSSION

In its Order in Docket No. 08-035-78, dated February 12, 2009, the Commission directed the Company to update annually the valuation of net excess generation credits for large non-residential customers in Schedule 135 to reflect the average retail rates for the previous year's FERC Form No. 1.

In compliance with this Commission Order, the Company filed its Second Revision Sheet No. 135.4 of Electric Service Schedule 135. This sheet contains the updated net excess generation credits for large non-residential customers in Schedule 135. In this filing, the Company also provided Exhibit 1, which shows how the average retail credits were calculated for large non-residential customers. The Division has reviewed whether the information used to calculate the average credits was consistent with the previous year's FERC Form No. 1 stated numbers and whether the average retail credits for the large non-residential customers was calculated properly. The Division determined that the calculations were performed correctly using the appropriate information. The \$.0057 overall difference between Exhibit 1 and FERC Form 1 Utah Supplemental is reasonable.

In reviewing the Company's advice letter for this matter, Utah Administrative Code Rule 746-405-2 (D) (3) (g) requires a statement that the tariff sheets proposed do not constitute a violation of state law or Commission rule. However, the rule also states that the filing of proposed tariff sheets shall of itself constitute the representation of the filing utility that it, in good faith, believes the proposed sheets or revised sheets to be consistent with applicable statutes, rules and orders. The Division assumes that this filing does not violate statute or rule and has not found any indication to the contrary.

Therefore, the Division concludes that the Company's filing complies with the Commission Order. Hence, the Division recommends that the Commission approve the Company's filing effective July 1, 2016.

CC: Bob Lively, RMP
Michele Beck, OCS