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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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| In the Matter of PacifiCorp’s Revision |) | DOCKET NO. 16-035-T14 |
| to Schedule 135, Net Metering Service |) | |
| and Proposal for New Schedule 135A, |) | |
| Net Metering – Transition Service |) | |
| |) | REPLY COMMENTS OF UTAH SOLAR |
| |) | ENERGY ASSOCIATION |

Background

On November 9, 2016, Rocky Mountain Power (the “Company”) filed proposed tariff sheets associated with Tariff P.S.C.U. No 50 of PacifiCorp, d.b.a. Rocky Mountain Power, applicable to electric service in the State of Utah. This tariff filing is a proposed revision of Schedule 135 Net Metering Service to New Schedule 135A Net Metering - Transition Service. On November 10, 2016 the Commission issued a Notice of Filing and Comment Period asking interested parties to comment on or before November 22, 2016. Reply comments were requested on or before Tuesday, November 29, 2016. These reply comments on behalf of the Utah Solar Energy Association (“Association”) and its members, are submitted to address specific issues raised by The Office of Consumer Services and The Division of Public Utilities in their comments.

Again as stated in our initial comments, the Association and its’ members urge the Commission to reject or suspend Revisions to Schedule 135, Net Metering Service and Proposal

for new Schedule 135A, Net Metering - Transition Service. It is notable that *every* party that submitted comments, other than Rocky Mountain Power, recommended rejecting or suspending Rocky Mountain Power's Advice No. 16-13.

Discussion

Additional or special notice to customers regarding changes to the net metering rate structure is not necessary. If, in fact, one of the purposes of the tariff filing is to provide information or "notice" to customers, then Company's proposal for a fixed charge and the Commission's proceedings in Docket No. 14-035-114 adequately provide such notice. There is no need to treat the net-metering customers differently than other customers, and no special notice is necessary from the Commission.

The tariff would create stability for existing net metering customers by keeping them on the existing rate structure. However the proposed Schedule 135A would impose a new rate structure on new customers. As Division of Public Utilities points out in comments submitted, it is questionable whether this is consistent with current statutory language in Utah Code Ann. §54-3-8. It would be problematic to adopt this structure without further analyses.

Conclusion

In conclusion, the Association and its' members respectfully urge the Commission to reject or suspend Revisions to Schedule 135, Net Metering Service and Proposal for new Schedule 135A, Net Metering – Transition Service.

HOLLAND & HART, LLP

 /s/ Amanda Smith
Amanda Smith
Jennifer S. Horne
Attorney for Utah Solar Energy Association

CERTIFICATE OF SERVICE

I hereby certify that I will cause a true and correct copy of the foregoing **REPLY COMMENTS OF UTAH SOLAR ENERGY ASSOCIATION** to be delivered to the Utah Public Service Commission on November 29, 2016 via hand delivery and to be served via email on that day on the following persons:

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/s/ Julie Uriona