

September 10, 2018

***VIA ELECTRONIC FILING***

Utah Public Service Commission  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84114

Attention: Gary Widerburg  
Commission Secretary

**RE: 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

**Docket No. 14-035-71**

In the Matter of Rocky Mountain Power's Annual Report of the Results from the 2013 Program Year for the Solar Photovoltaic Incentive Program Offered through Schedule 107

**Docket No. 18-035-24**

Solar Photovoltaic Incentive Program (Schedule 107) 2018 Annual Report

***Reply Comments***

On July 25, 2018, the Public Service Commission of Utah ("Commission") issued a Notice of Filing and Comment Period ("Notice") requesting comments on Rocky Mountain Power's ("Company") July 17, 2018 reply comments proposing modifications to its reporting requirements regarding the Utah Solar Photovoltaic Incentive Program offered through Electric Service Schedule No. 107 ("Report"). The Division of Public Utilities ("Division") and the Office of Consumer Services ("Office") submitted comments on August 22, 2018, and August 21, 2018, respectively. Consistent with the Notice, the Company submits reply comments below.

In the Company's July 17, 2018 reply comments, it recommended the USIP reporting requirement be modified so that only the following information is provided in future reports:

1. Program totals for interconnected projects
2. Production meter data for large non-residential projects (Attachment B)
3. Program account summary (Table 15)
4. Projected expenditures by year
5. Renewable energy certificates (Table 16)

The Company recommended these changes since USIP is no longer accepting new applications to better reflect the pertinent information while the program installment payments are paid to qualified participants as committed over the remaining four years.

***Response to the Division's Comments***

The Division supports the Company's recommended changes based on the fact that the

USIP program expenses and balances now fall under the STEP reporting structure, and the Company has agreed to provide documents that correlate the information provided in the USIP and STEP reports. The Division further recommends that the Company continue to provide Attachment A, including updated Renewable Energy Credit (“REC”) information, and one more year of surrendered deposit data so interested parties can reasonably conclude that no more projects are pending, and only incentive payouts remain. The Company agrees with the Division’s request.

***Response to the Office’s Comments***

The Office acknowledges that re-evaluating reporting requirements is appropriate with the closing of the program and states its support for the changes recommended by the Company, if adequately presented, indicating it should be enough for the parties to evaluate the program. The Office requests the Company clarify in reply comments that it intends to continue to provide Attachment A. The Company confirms that it plans to include Attachment A in future reports. Also, the Office requests that the Company continue to report on the amount of surrendered deposits for at least 2019. Afterwards, the Office states it does not object to the Company eliminating this information from ongoing reports as long as the information does not change. The Company agrees to this request.

***Summary***

Based on the recommendations of the Division and Office, the Company requests the Commission approve the following information be required in future USIP reports:

1. Program totals for interconnected projects
2. Production meter data for large non-residential projects (Attachment B)
3. Program account summary (Table 15)
4. Projected expenditures by year
5. Renewable energy certificates (Table 16)
6. List of interconnected projects and deemed RECs (Attachment A)
7. Summary and accounting of final surrendered deposits and final 2016 results (2019 Report only unless the information changes)

Sincerely,



Joelle Steward  
Vice President, Regulation

**CERTIFICATE OF SERVICE**

Docket Nos. 11-035-104, 14-035-71, and 18-035-24

I hereby certify that on September 10, 2018, a true and correct copy of the foregoing was served by electronic mail to the following:

**Utah Office of Consumer Services**

Cheryl Murray     [cmurray@utah.gov](mailto:cmurray@utah.gov)  
Michele Beck     [mbeck@utah.gov](mailto:mbeck@utah.gov)

**Division of Public Utilities**

Chris Parker     [ChrisParker@utah.gov](mailto:ChrisParker@utah.gov)  
William Powell   [wpowell@utah.gov](mailto:wpowell@utah.gov)  
Erika Tedder     [etedder@utah.gov](mailto:etedder@utah.gov)

**Utah Clean Energy**

Hunter Holman   [hunter@utahcleanenergy.org](mailto:hunter@utahcleanenergy.org)  
Kate Bowman     [kate@utahcleanenergy.org](mailto:kate@utahcleanenergy.org)

**US Magnesium LLC**

Roger Swenson   [roger.swenson@prodigy.net](mailto:roger.swenson@prodigy.net)

**Rocky Mountain Power**

Jana Saba         [jana.saba@pacificorp.com](mailto:jana.saba@pacificorp.com)  
                         [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)  
                         [utahdockets@pacificorp.com](mailto:utahdockets@pacificorp.com)  
Yvonne Hogle     [yvonne.hogle@pacificorp.com](mailto:yvonne.hogle@pacificorp.com)



Katie Savarin  
Coordinator, Regulatory Operations