

May 14, 2019

VIA ELECTRONIC FILING

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

Attention: Gary Widerburg

Commission Secretary

RE: Docket No. 19-035-14

In the Matter of Rocky Mountain Power's 2018 Annual Report of the Blue Sky

Program

Reply Comments

On April 1, 2019, the Public Service Commission of Utah ("Commission") issued a Notice of Filing and Comment Period in the above referenced matter, with comments and reply comments to be submitted by April 29, 2019, and May 14, 2019, respectively. The Division of Public Utilities ("DPU") filed comments on April 29, 2019. Rocky Mountain Power ("Company") provides these reply comments in response to DPU's comments.

The DPU concluded in their comments that the 2018 Annual Blue Sky Report ("2018 Report") substantially complies with Commission Orders and reporting requirements, save for the omission of the number of project applications received and rejected for the reporting period. The DPU recommends the Commission wait to acknowledge the 2018 Report until after the Company provides the omitted information.

Accordingly, attached hereto as Exhibit A is an Updated 2018 Report, with the requested information included in the "Project Commitments" tab, rows 25 through 27, and also included in the table below:

# Applications Received October-December 2018	6
# Applications Awarded	3
# Applications Declined	3

Sincerely,

Michael S. Snow

Manager, Customer Solutions Regulatory Affairs

185500

Exhibit A Updated 2018 Annual Blue Sky Report

2018 Blue Sky Block and Bulk Program - Summary Report

Program Management Commentary

Customer counts continue to increase year-to-year. A few business partner reductions have been received due to competing tariffs being offered by the Company, resulting in slightly reduced revenues. Program outreach efforts will increase in 2019 and 2020 to increase participation rates. The release of \$1.2M in Blue Sky Build Project funds is also expected to increase grant application traffic resulting in additional community outreach events. No critical risks identified at this time.

Program Sales Summary					Click to see Dashboard
	2016	2017	2018	2016-17 Growth %	2017-18 Growth %
Total Company Block Sales	3,587,626	3,422,813	3,403,975	-4.6%	-0.6%
Total Utah Block Sales	1,664,531	1,653,532	1,644,891	-0.7%	-0.5%
Total Company Program Net Revenues	\$4,732,147	\$4,707,028	\$4,721,907	-0.5%	0.3%
Total Utah Program Net Revenues	\$2,716,573	\$2,677,080	\$2,656,517	-1.5%	-0.8%
Total Company Year End Customer Counts	67,107	70,076	74,805	4%	7%
Total Utah Year End Customer Counts	43,352	44,956	47,137	4%	5 %

Program Expenses Summary					Click to see Dashboard
	2016	2017	2018	2016-17 Variance	2017-18 Variance
Total Company Program Expenses	\$955,272	\$886,758	\$982,892	-7.2%	10.8%
Total Utah Program Expenses	\$466,153	\$345,148	\$403,134	-26.0%	16.8%

Renewable Energy Certificate (REC) Status

Click to see REC Purchase Detail

REC Balance Jan 1, 2018	0	
Net RECs Needed for 2018 Sales	340,398	
Total RECs Purchased for 2018 Sales	340,398	
Balance	0	

2017 Green-E Audit Completed August 2018; Certification in good standing. Program invoice details have been submitted to the Center for Resource Solutions (CRS) for the 2018 audit cycle.

Utah Project Commitments		Click to see Project Commitment Detail
	Amount	
Open UT Project Commitments	\$5,283,605	
New 2019 UT Project Commitments	\$520,467	
Total Project Commitments	\$5,804,072	

Utah Liability Account Balance Reconciliation

-		=
Jan 2018 Liability Account Balance	\$8,521,484	+
2018 Net Revenue	\$2,656,517	+
2018 Interest Revenue	\$378,473	+
-	-\$403,134	2018 Program Expenses
-	-\$318,058	2018 REC Invoices Paid (2017 and 2018 fulfillment)
-	-\$844,249	2018 Project Award Distributions
Dec 2018 Liability Account Balance =	\$9,991,032	
-	-\$5,804,072	Project Commitments
-	-\$92,783	RECs Balance Estimate (To Be Paid in 2019)
Available Uncommitted Funds =	\$4,094,177	

2018 Program Marketing and Communications Highlights

BLUE SKY LEGACY - GREEN BUSINESS AWARDS

Four business customers were recognized in October 2018 for their long-standing Blue Sky partnerships. Park City, Utah was presented with the Blue Sky Legacy Community award; small business awards were presented to Squatters Brewery, Mazza Restaurant and Vertical Diner.

BLUE SKY CUSTOMER SURVEY

Survey was completed in 4th quarter 2017. Analysis completed and program strategy and outreach campaign has been created to increase engagement with business customers and to improve communication of participant impact. Program block upgrades are planned, along with the program's 20-year anniversary campaign to increase participation through multiple channel outreach efforts.

2018 BLUE SKY EVENT HIGHLIGHTS

Several renewable energy grant projects were completed during 2018 and Blue Sky Program participants were recognized through multiple media channels locally and nationally. One of the projects, the North Sanpete School District, has been nominated for two awards recognizing the project for excellence in innovation and for expansion of renewable energy growth.

NEW BLUE SKY GRANT PROJECT WEBPAGES

North Sanpete School District, including video case study

Ogden Rescue Mission

Community of Grace Presbyterian Church

Bluffdale Fire Station #92

Christian Center of Park City

BLUE SKY GRANT PROCESS

A new web-based software program has been launched to enable grant applications to be received year-round. Several more applications are expected to be submitted during second quarter of 2019 once all software testing is completed.

EVENTS AND COMMUNICATIONS

Blue Sky was featured at several different events during 2018 including Utah Clean Cities 25th Anniversary Celebration at Loveland Living Planet Aquarium, the NetZero Energy Summit and the Hill Airforce Base Airshow in Ogden. The curriculum at Junior Achievement's BizTown at Gateway in Salt Lake City was also updated to include Blue Sky and teach students about the importance of renewable energy.

ProjectOpen Grand Opening (partner with Subscriber Solar)

Fall 2018 Forecast Newsletter

Hill Airforce Base Airshow

2018 BLOCK AND BULK PROMOTIONAL CONCESSIONS

Events	Estimated Attendance	Promotional Items	Cost
Award Celebrations (6)	30-200 each	250 Sunglasses @ 0.87 each	\$ 217.50
Outreach Events (10)	100-20,000 each	4250 Sunglasses @ 0.87 each	\$ 3,697.50
		1500 green bands @ 0.13 each	\$ 195.00
			\$ 4,110.00

2018 Blue Sky Block and Bulk Program Dashboard

State	Blocks Sold	Gross Rev (No Int)	% of Revenue
CA	41,381	\$79,754.69	1.69%
ID	30,392	\$58,399.78	1.24%
OR	1,442,288	\$1,456,018.38	30.84%
UT	1,644,891	\$2,656,540.15	56.26%
WA	136,826	\$262,352.53	5.56%
WY	108,197	\$208,869.72	4.42%
Grand Total	3,403,975	\$4,721,935.25	100.00%
	CA ID OR UT WA WY	CA 41,381 ID 30,392 OR 1,442,288 UT 1,644,891 WA 136,826 WY 108,197	CA 41,381 \$79,754.69 ID 30,392 \$58,399.78 OR 1,442,288 \$1,456,018.38 UT 1,644,891 \$2,656,540.15 WA 136,826 \$262,352.53 WY 108,197 \$208,869.72

Month	Cust Counts	% Counts
Dec	74,8	305 100.00%
CA	1,8	383 2.52%
ID	1,6	557 2.22%
OR	13,4	104 17.92%
UT	47,1	137 63.01%
WA	5,6	7.51%
WY	5,1	107 6.83%

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2018 PROJECT O	COMMITMENTS	
State	# Projects	Dollars Committed
CA		\$0.00
ID		\$0.00
OR	8	\$1,173,577.00
UT	11	\$5,283,605.00
WA	1	\$155,263.00
WY		\$0.00
Grand Total	20	\$6,612,445.00

UTAH PROGRAM EXPENSE DETAIL

Program Name (All)

BLOCKS and REVENUE

Expense	Exp Category							
By State	Prod Mgmt	Administration	Communication	Business Partnerships	Fulfillment	Cust Ed/Outreach	Sales Collateral	Grand Total
UT	\$121,724.52	\$57,573.32	\$56,069.12	\$23,949.23	\$57,650.98	\$75,838.70	\$10,328.41	\$403,134.28
Jan	\$13,899.92	\$7,144.27	\$2,848.60	\$1,630.53	\$5,626.23	\$1,648.00	\$4,685.43	\$37,482.98
Feb	\$11,657.29	\$3,603.51	\$2,820.96	\$1,571.97	\$4,787.25		\$543.00	\$24,983.98
Mar	\$11,693.36	\$4,367.91	\$2,820.96	\$1,571.97	\$4,630.73		\$303.00	\$25,387.93
Apr	\$10,922.00	\$3,480.72	\$2,820.96	\$1,571.97	\$4,818.57		\$437.00	\$24,051.22
May	\$9,427.29	\$3,432.01	\$2,820.96	\$1,610.72	\$4,240.30	\$1,387.71	\$563.48	\$23,482.47
Jun	\$9,156.39	\$3,487.01	\$6,718.15	\$1,571.97	\$7,375.17	\$17,357.34	\$809.00	\$46,475.03
Jul	\$6,047.51	\$3,404.51	\$18,323.48	\$1,571.97	\$4,728.48	\$1,901.28	\$133.50	\$36,110.73
Aug	\$8,878.19	\$3,462.42	\$2,820.96	\$1,571.97	\$4,240.30	\$7,147.21	\$1,211.50	\$29,332.55
Sep	\$14,096.06	\$3,600.58	\$2,902.67	\$1,416.19	\$4,299.02	\$15,245.39		\$41,559.91
Oct	\$12,056.76	\$4,413.51	\$5,242.16	\$1,416.19	\$4,494.64	\$5,527.20	\$730.50	\$33,880.96
Nov	\$9,373.05	\$3,435.58	\$2,902.67	\$7,027.59	\$3,635.21	\$15,526.27	\$478.00	\$42,378.37
Dec	\$4,516.70	\$13,741.29	\$3,026.59	\$1,416.19	\$4,775.08	\$10,098.30	\$434.00	\$38,008.15
Grand Total	\$121,724.52	\$57,573.32	\$56,069.12	\$23,949.23	\$57,650.98	\$75,838.70	\$10,328.41	\$403,134.28

WY		\$			
Grand Total	20	\$6,612,44			
UTAH INTEREST REVENUE & LIABILITY ACCT BAL					

UTAH INTERES	UTAH INTEREST REVENUE & LIABILITY ACCT BAL					
Month	Average Balance	Interest Revenue				
Jan	\$8,594,821.79	\$30,010				
Feb	\$8,773,883.60	\$30,635				
Mar	\$8,969,378.98	\$31,318				
Apr	\$9,158,531.46	\$31,215				
May	\$9,055,829.26	\$30,865				
Jun	\$8,940,574.73	\$30,472				
Jul	\$9,088,042.22	\$30,975				
Aug	\$9,228,007.96	\$31,452				
Sep	\$9,397,362.48	\$32,029				
Oct	\$9,550,327.77	\$32,551				
Nov	\$9,734,879.05	\$33,180				
Dec	\$9,907,898.55	\$33,769				

TOTAL PROGRAM EXPENSE DETAIL

Program Name (All)

Expense	Exp Category							
By State	Prod Mgmt	Administration	Communication	Business Partnerships	Fulfillment	Cust Ed/Outreach	Sales Collateral	Grand Total
Jan	\$21,159.00	\$14,998.48	\$4,946.84	\$5,469.81	\$9,931.24	\$18,666.06	\$5,232.09	\$80,403.52
Feb	\$24,557.46	\$6,135.79	\$4,919.20	\$5,411.25	\$8,445.99		\$859.50	\$50,329.19
Mar	\$24,192.60	\$11,998.61	\$4,919.20	\$5,447.26	\$8,105.95	\$16,833.90	\$486.50	\$71,984.02
Apr	\$25,985.65	\$6,069.69	\$4,945.76	\$5,411.25	\$8,398.21		\$684.50	\$51,495.06
May	\$24,400.00	\$5,964.29	\$4,919.20	\$5,469.66	\$7,394.24	\$54,354.05	\$875.48	\$103,376.92
Jun	\$20,955.50	\$6,581.77	\$9,838.14	\$5,411.25	\$13,949.78	\$18,433.99	\$1,252.00	\$76,422.43
Jul	\$17,295.14	\$6,729.85	\$28,633.15	\$5,411.25	\$8,632.89	\$39,112.31	\$3,121.00	\$108,935.59
Aug	\$23,985.34	\$6,454.80	\$4,919.20	\$5,411.25	\$7,467.87	\$26,252.05	-\$976.50	\$73,514.01
Sep	\$28,689.29	\$6,128.48	\$5,061.68	\$4,875.00	\$7,714.35	\$46,628.41		\$99,097.21
Oct	\$20,781.32	\$9,312.50	\$7,617.93	\$4,875.00	\$7,904.68	\$28,590.76	\$1,137.00	\$80,219.19
Nov	\$24,583.81	\$7,134.06	\$5,061.68	\$10,486.40	\$6,339.08	\$35,556.39	\$712.00	\$89,873.42
Dec	\$14,866.07	\$29,567.14	\$5,197.09	\$4,981.25	\$8,685.86	\$33,250.16	\$693.50	\$97,241.07
Grand Total	\$271,451.18	\$117,075.46	\$90,979.07	\$68,660.63	\$102,970.14	\$317,678.08	\$14,077.07	\$982,891.63

REC PURCHASES IN 2018

State UT

Month Paid	Green Tag Purchases
Jan	\$48,831.70
Mar	\$76,401.59
May	\$85,975.66
Jun	\$2,941.46
Jul	\$11,937.75
Aug	\$33,320.64
Oct	\$57,844.00
Dec	\$805.50
Grand Total	\$318,058.30

Return to Summary
Return to Dashboard

Generator	(State)	# RECs (MWH)	Fuel Type	Generation Mo/Yr	Facility Install Mo/Yr	Tradable	Price per REC	Total Cost	Invoice Date	Invoice Year	REC Year
Granite Mountain Solar East, LLC	UT	1,060	Solar	Aug-17	October 25, 2016	Yes	\$1.60	\$1,696.00	3/12/2018	2018	2018
Granite Mountain Solar East, LLC	UT	8,682	Solar	Sep-17	October 25, 2016	Yes	\$1.60	\$13,891.20	3/12/2018	2018	2018
Granite Mountain Solar East, LLC	UT	4,614	Solar	Oct-17	October 25, 2016	Yes	\$1.60	\$7,382.40	3/12/2018	2018	2018
Granite Mountain Solar East, LLC	UT	3,850	Solar	Nov-17	October 25, 2016	Yes	\$1.60	\$6,160.00	3/12/2018	2018	2018
Chopin Wind, LLC	OR	12,739	Wind	Oct-18	October 1, 2016	Yes	\$1.75	\$22,293.25	10/1/2018	2018	2018
Granite Mountain Solar East, LLC	UT	1,845	Solar	Dec-18	September 1, 2016	Yes	\$1.75	\$3,228.75	10/1/2018	2018	2018
Spanish Fork Wind Park	UT	2,000	Wind	Dec-17	July 31, 2008	Yes	\$1.90	\$3,800.00	5/8/2018	2018	2018
Yahoo Creek Wind Park	ID	3,032	Wind	Jul-17	December 1, 2010	Yes	\$2.85	\$8,641.20	4/27/2018	2018	2018
Yahoo Creek Wind Park	ID	2,329	Wind	Aug-17	December 1, 2010	Yes	\$2.85	\$6,637.65	4/27/2018	2018	2018
Yahoo Creek Wind Park	ID	1,536	Wind	Aug-17	December 1, 2010	Yes	\$2.85	\$4,377.60	4/27/2018	2018	2018
Yahoo Creek Wind Park	ID	3,518	Wind	Sep-17	December 1, 2010	Yes	\$2.85	\$10,026.30	4/27/2018	2018	2018
Yahoo Creek Wind Park	ID	5,717	Wind	Oct-17	December 1, 2010	Yes	\$2.85	\$16,293.45	4/27/2018	2018	2018
Yahoo Creek Wind Park	ID	5,826	Wind	Nov-17	December 1, 2010	Yes	\$2.85	\$16,604.10	4/27/2018	2018	2018
Yahoo Creek Wind Park	ID	3,042	Wind	Dec-17	December 1, 2010	Yes	\$2.85	\$8,669.70	4/27/2018	2018	2018
Escalante Solar I, LLC	UT	315	Solar	Jul-17	August 17, 2016	Yes	\$1.40	\$441.00	4/27/2018	2018	2018
Escalante Solar I, LLC	UT	4,150	Solar	Nov-17	August 17, 2016	Yes	\$1.40	\$5,810.00	4/27/2018	2018	2018
Escalante Solar I, LLC	UT	4,743	Solar	Dec-17	August 17, 2016	Yes	\$1.40	\$6,640.20	4/27/2018	2018	2018
Escalante Solar II, LLC	UT	9,542	Solar	Jul-17	August 17, 2016	Yes	\$1.40	\$13,358.80	4/27/2018	2018	2018
Escalante Solar II, LLC	UT	10,265	Solar	Aug-17	August 17, 2016	Yes	\$1.40	\$14,371.00	4/27/2018	2018	2018
Escalante Solar II, LLC	UT	4,193	Solar	Sep-17	August 17, 2016	Yes	\$1.40	\$5,870.20	4/27/2018	2018	2018
Escalante Solar II, LLC	UT	5,330	Solar	Nov-17	August 17, 2016	Yes	\$1.40	\$7,462.00	4/27/2018	2018	2018
Escalante Solar II. LLC	UT	5,349	Solar	Dec-17	August 17, 2016	Yes	\$1.40	\$7,488.60	4/27/2018	2018	2018
Escalante Solar III, LLC	UT	4,778	Solar	Nov-17	August 17, 2016	Yes	\$1.40	\$6,689.20	4/27/2018	2018	2018
Escalante Solar III, LLC	UT	5,221	Solar	Dec-17	August 17, 2016	Yes	\$1.40	\$7,309.40	4/27/2018	2018	2018
Granite Mountain Solar East, LLC	UT	1,913	Solar	Nov-17	October 25, 2016	Yes	\$1.40	\$2,678.20	4/27/2018	2018	2018
Granite Mountain Solar East, LLC	UT	5,179	Solar	Dec-17	October 25, 2016	Yes	\$1.40	\$7,250.60	4/27/2018	2018	2018
Granite Mountain Solar West, LLC	UT	4,794	Solar	Jul-17	October 25, 2016	Yes	\$1.40	\$6,711.60	4/27/2018	2018	2018
Granite Mountain Solar West, LLC	UT	2,380	Solar	Oct-17	October 25, 2016	Yes	\$1.40	\$3,332.00	4/27/2018	2018	2018
Granite Mountain Solar West, LLC	UT	3,626	Solar	Nov-17	October 25, 2016	Yes	\$1.40	\$5,076.40	4/27/2018	2018	2018
Granite Mountain Solar West, LLC	UT	3,222	Solar	Dec-17	October 25, 2016	Yes	\$1.40	\$4,510.80	4/27/2018	2018	2018
Cedar Creek	CO	11,386	Wind	Aug-17	November 20, 2007	Yes	\$1.50	\$17,079.00	7/5/2018	2018	2018
Cedar Creek	CO	9,742	Wind	Sep-17	November 20, 2007	Yes	\$1.50	\$14,613.00	7/5/2018	2018	2018
Cedar Creek	CO	783	Wind	Sep-17	November 20, 2007	Yes	\$1.50	\$1,174.50	7/5/2018	2018	2018
Cedar Creek	CO	9,868	Wind	Oct-17	November 20, 2007	Yes	\$1.50	\$14,802.00	7/5/2018	2018	2018
Cedar Creek	CO	14,741	Wind	Dec-17	November 20, 2007	Yes	\$1.50	\$22,111.50	7/5/2018	2018	2018
Escalante Solar I	UT	5,437	Solar	Jul-17	August 31, 2016	Yes	\$1.50	\$8,155.50	9/13/2018	2018	2018
Escalante Solar II	UT	10,542	Solar	Jul-17	August 31, 2016	Yes	\$1.50	\$15,813.00	9/13/2018	2018	2018
Escalante Solar III, LLC	UT	10,542	Solar	Jul-17	August 31, 2016	Yes	\$1.50	\$15,813.00	9/13/2018	2018	2018
Granite Mountain Solar East, LLC	UT	300		Jul-17 Jul-17	September 21, 2016	Yes	\$1.50	\$15,844.50	9/13/2018		
Granite Mountain Solar East, LLC Granite Mountain Solar East, LLC	UT	11,350	Solar	Jul-17 Jun-18	' '		•	\$450.00	1	2018 2018	2018 2018
, , ,		,	Solar		October 25, 2016	Yes	\$1.60		3/12/2018		
Granite Mountain Solar East, LLC Granite Mountain Solar West, LLC	UT	10,041	Solar	Jul-17	September 21, 2016 September 30, 2016	Yes	\$1.50	\$15,061.50	10/11/2018	2018	2018
, , ,	UT	6,423	Solar	Jul-17	<u> </u>	Yes	\$1.50	\$9,634.50	10/11/2018	2018	2018
Iron Springs Solar		10,483	Solar	Jul-17	August 15, 2016	Yes	\$1.50	\$15,724.50	10/11/2018	2018	2018
Iron Springs Solar	UT	10,469	Solar	4th Q 2018	August 15, 2016	Yes	\$1.20	\$12,562.80	TBD	2019	2018
Cedar Creek	CO	53,480	Wind	4th Q 2018	November 20, 2007	Yes	\$1.50	\$80,220.00	TBD	2019	2018
Cedar Creek	CO	1,454	Wind	Jul-18	November 20, 2007	Yes	\$2.25	\$3,271.50	1/3/2019	2019	2018
Cedar Creek	CO	7,540	Wind	Jul-18	November 20, 2007	Yes	\$2.25	\$16,965.00	1/3/2019	2019	2018
Cedar Creek	CO	14,206	Wind	Aug-18	November 20, 2007	Yes	\$2.25	\$31,963.50	1/3/2019	2019	2018
Cedar Creek II	CO	6,800	Wind	Aug-18	June 9, 2011	Yes	\$2.25	\$15,300.00	1/3/2019	2019	2018
Total Renewable Energy	1	340,398				Average Price	\$1.74	\$563,607.90	l		

2018 Blue Sky Block and Bulk Program - Project Commitments

Utah Project Commitments

Return to Summary
Return to Dashboard
Available Funds Criteria

Existing Project Name	City	Technology	Size (kW)	Committed Funds	Status
Bluffdale City Fire #9 I	Bluffdale	Solar	40	\$85,139	Closing
Bluffdale City Hall	Bluffdale	Solar	56	\$119,494	Closing
Centro Civico	Salt Lake City	Solar	64.6	\$120,000	In Progress
SLC Corporation	Salt Lake City	Solar	115	\$140,000	In Progress
S ру H ор	Salt Lake City	Solar	40.9	\$77,472	In Progress
State of Utah DFCM	Salt Lake City	Solar	242.19	\$260,000	Closing
Utah Department of Transportation	Taylorsville	Solar	176.2	\$246,630	In Progress
Utah State University	Logan	Solar	100	\$200,495	In Progress
Park City Museum Education & Collections Center	Park City	Solar	22.68	\$37,740	Closing
STEP Solar Battery Project	TBD	Solar/Battery	TBD	\$1,900,000.00	In Progress
Blue Sky Build (I) *	TBD	Solar	TBD	\$0.00	Cancelled
Blue Sky Build (2) **	TBD	Solar	TBD	\$2,096,635.00	Under Contract

Total Existing

\$5,283,605.00

Blue Sky Grant Applications are now accepted year-round (beginning October 2018)

# Applications Received October-December 2018	6
# Applications Awarded	3
# Applications Declined	3

New Project Name	City	Technology	Size (kW)	Committed Funds	Status
Salt Lake City Boys & Girls Club	Salt Lake City	Solar	96.6	\$209,116	Launch
New Boys & Girls Club located near North Te	mple and 600 West; construction	n underway.			
The Inn Between	Salt Lake City	Solar	136.3	\$230,661	Launch
New location for hospice center for homeles	s citizens.				
			44.16	\$80,690	Launch

^{* \$1,200,000} for Blue Sky Build project being returned to general fund as available funds for projects due to cancellation of North Temple Office project.

^{**} Blue Sky Build project is expected to be completed in Ogden, UT by Dec 2019; Studies for a project in Moab, UT are scheduled to begin in April 2019.

Project Standards and Evaluation Criteria

Rocky Mountain Power favors projects and activities that:

Result in the production of renewable electricity

Support communities through a strong education and public engagement component

Support a Blue Sky customer project/community

Provide strong environmental and economic benefit to local communities and Rocky Mountain Power/Pacific Power customers

Build regional capability

Take advantage of other funding sources available to support the project

Are owned by a non-profit organization, school, tribal government, religious institution or other community-oriented organization

Each application is reviewed with the following consideration given to the individual project. Does the project:

Assist in the creation of new renewable electricity sources within PacifiCorp's Rocky Mountain Power/Pacific Power service areas

Stimulate renewable energy development by increasing the capacity of individuals, community groups or other organizations to undertake and support renewable energy development in their respective communities

Encourage research and development of renewable energy sources

Promote education in the community on new renewable energy generation and increase knowledge of Blue Sky program

The following criteria are considered equally - however if any one measure carries more weight it is community benefit:

Timeframe - How quickly will the project move forward? Is the proposed installation timeframe reasonable? Projects are expected to be on line within 12 months, unless agreed to otherwise. Extensions are granted on a project-by-project basis (e.g. installations associated with new construction are expected to be online with 24 months.) What is the probability of completion within the proposed timeframe? Have potential delay risks been identified and properly mitigated? Has an adequate amount of pre-development work been completed? Has the applicant had preliminary conversations with the utility regarding net metering/interconnection? Are there significant challenges associated with interconnection? Have all required permits and approvals been accurately identified? Are any critical approvals pending or unlikely to be secured?

Site – Is the project sponsor ready to proceed with the project (i.e. efforts undertaken related to feasibility, financial agreements, permitting). Can the site effectively host a renewable energy project? Is permitting required? Have rights, options or leases been granted to secure site control? What is the probability of the project being built?

Financing – Is there an adequate financial structure that will ensure it's completion within the timeframe specified? Is the customer or vendor a reliable business partner? Is there adequate financial structure that will ensure the project's completion within the allotted timeframe? Does the applicant have longevity at the site? Does the applicant appear to be financially stable/reliable? Are there undue financial risks which would put the project in jeopardy? Have potential risks been identified and mitigated? Does the applicant have a financial stake in the project that ensures it's completion.

Project Champion/Project Team - What is the experience of the developer? Is there a dedicated project proponent with a long-term stake in the project's success and who will work to overcome obstacles in making this project happen? What is the relevant experience of the project team? Have all required team members been identified? Is the organization and project team effective and responsive?

Additionality - Can these funds be used to make the difference in bringing additional renewable resources on line? Are Blue Sky funds required for the project to be successful? Is the proportion of cost requested reasonable? Are there other secured or pending sources of funding besides Blue Sky?

Fuel Source - Is the renewable resource eligible under the tariff - wind, solar, geothermal, certified low-impact hydro, pipeline or irrigation canal hydroelectric system, wave energy, low-emissions biomass based on digester methane gas from landfills, sewage treatment plants or animal waste and biomass energy based on solid organic fuels from wood, forest or field residues or dedicated crops that do not include wood pieces that have been treated with chemical preservatives such as creosote, pentachlorophenol or copper chrome arsenic to help facilitate the commercial application of renewable energy technologies.

Technology - Is the planned energy source eligible? Is the proposed technology appropriate for the site? Is the technology proven and established and is the equipment covered under warranty? If not, is there research and development value to the project? Are there undue technical risks putting the project completion in jeopardy? Have technical risks been mitigated? Is the energy generation estimate accurate and supported by well-documented calculations? Is the capacity factor reasonable? Has maintenance of the system been properly addressed to ensure long-term operations? Does the project encourage new or emerging technologies?

Availability - Is the project owner willing to allocate RECs generated by the project to the Blue Sky program?

Cost - Are the total project costs and cost-share requested reasonable based on industry standards/for the proposed technology/size/location? Were multiple bids received from competitive contractors? Does the budget represent the maximum value for the price?

Geography - Proportional contribution to Pacific Power/Rocky Mountain Power service areas: CA, ID, OR, UT, WA, WY based on Blue Sky option customer subscription levels

Community Benefit - Can benefits be leveraged for the community and Blue Sky customers? What are the secondary environmental, social and economic benefits? Does the project help build regional renewable energy expertise? Does it stimulate the regional renewable energy marketplace? Is the community aware of and supportive of the project? Is it likely that there will be negative impacts from this project? How will the facility help educate the community about the benefits of renewable energy and the Blue Sky program? How does the project tie into the mission of the host organization? Are the project goals consistent with those of the Blue Sky program? What is the level of community participation in the Blue Sky program where the project will be located? Is there a plan to recognize the Blue Sky program and participating customers for their contribution to the project? Does the project offer unique/new exposure to Blue Sky? Is the project highly visible?

CERTIFICATE OF SERVICE

Docket No. 19-035-14

I hereby certify that on May 14, 2019, 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
Michele Beck mbeck@utah.gov

Division of Public Utilities

Brenda Salter <u>bsalter@utah.gov;</u>

dpudatarequest@utah.gov

Assistant Attorney General

Patricia Schmid pschmid@agutah.gov
Justin Jetter jjetter@agutah.gov
Robert Moore rmoore@agutah.gov
Steven Snarr stevensnarr@agutah.gov

Rocky Mountain Power

Data Request Response <u>datarequest@pacificorp.com</u>

Center

Jana Saba jana.saba@pacificorp.com;

utahdockets@pacificorp.com

Michael Snow michael.snow@pacificorp.com

Katie Savarin

Coordinator, Regulatory Operations