

July 1, 2019

VIA ELECTRONIC FILING

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

Attention: Gary Widerburg
Commission Secretary

RE: Docket No. 19-035-29
Rocky Mountain Power's 2019 Net Metering Report
Reference Docket No. 08-035-T04

Enclosed for filing is Rocky Mountain Power's ("Company") Customer Owned Generation and Net Metering Report and Attachment A for the period April 1, 2018 through March 31, 2019 ("Report"). This Report is submitted in compliance with Docket 08-035-T04 and R746-312-16.

As shown in the Report, the value of excess generation credits from customers taking service on Electric Service Schedule No. 135 ("Schedule 135") and Electric Service Schedule No. 136 ("Schedule 136") is equal to \$153,206.43 and \$26,924.55, respectively. The value of the excess credits from Schedule 136 will be credited to the Energy Balancing Account, as approved by the Public Service Commission of Utah ("Commission") in a letter dated August 30, 2018 in Docket No. 18-035-28.

Regarding the value of the excess generation credits from Schedule 135, the Commission opened Docket No. 18-035-39 in order to consider alternative uses for those funds, which historically had been credited to the Home Electric Lifeline Program ("HELP"). The Commission issued an order on January 11, 2019, concluding:

We find the current use of Excess Credits to continue to be reasonable but find that it can be improved with one adjustment. While our October Order required that Excess Credits be credited as *additional revenue* collected under PacifiCorp's Schedule 91, we find that it is in the public interest to ensure incremental value is being provided to low-income customers. Therefore, instead of applying the Excess Credits to the Schedule 91 balancing account, PacifiCorp shall grant a one-time credit to all Schedule 3 customers during the April 2019 billing cycle. This credit shall be based on dividing the \$159,840 value of the Excess Credits by the number of Schedule 3 customers being served. We find this method is an equitable and reasonable modification of our October Order. In future years, PacifiCorp may propose different timing for the distribution of Excess Credits.¹

¹ Docket No. 18-035-39, January 11, 2019 Order, p. 9.

Consistent with the order, the Company recommends that the value of excess generation credits from Schedule 135 continue to be credited to HELP. To provide incremental value to the Company's low-income customers, the Company proposes that, instead of a one-time credit to Schedule No. 3, the monthly HELP credit be permanently increased. Providing an increased credit during all months of the year instead of a one-time credit passed back in a single month ensures that the benefit of excess generation credits from Schedule 135 is more broadly enjoyed by qualifying customers participating in the HELP program. This approach also lessens the administrative burden of developing and passing back a slightly different one-time credit each year. The Company estimates that an additional \$153,206.43 would add about \$0.54 to the monthly HELP credit, which currently provides a maximum monthly credit of \$12.60.

The value of excess generation credits from Schedule 135 in the Report is close to the amount reported in Docket No. 18-035-28, which was \$159,840. Since Schedule 135 is now closed to new service, the Company believes that the value of excess generation credits is likely to remain at this level in the future. The level can be examined each year in conjunction with the annual net metering reports, and if the value of excess generation credits from Schedule 135 diverges significantly from current levels, the Company could request a change in the additional increase to the HELP credit.

It is respectfully requested that all formal correspondence and staff requests regarding this matter be addressed to:

By E-mail (preferred): datarequest@pacificorp.com
Jana.saba@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah St., Suite 2000
Portland, OR 97232

Informal inquiries may be directed to Jana Saba, Regulatory Manager, at (801) 220-2823.

Sincerely,



Joelle Steward
Vice President, Regulation

Enclosures

cc: Division of Public Utilities
Office of Consumer Services

Rocky Mountain Power's
Customer Owned Generation and Net Metering Report

Rocky Mountain Power
Docket 08-035-T04
Customer Generation Report
For the period April 1, 2018 to March 31, 2019

1. Number of Customer Generation Systems (Data for report compiled on 6/21/2019)

Net Metering Facilities by Resource Type (Schedule 135)				
Resource	Facilities as of March 31, 2018	New Facilities April 1, 2018 to March 31, 2019	Total Facilities	New Facilities January 1, 2018 to December 31, 2018
Solar	29747	16	29763	1993
Wind	50	0	50	0
Solar and Wind	20	0	20	1
Other	0	0	0	0
Hydro	4	0	4	0
Fuel Cell	1	0	1	0
Total	29822	16	29838	1994

Customer Generation Facilities by Resource Type (Schedule 136)			
Resource	Facilities as of March 31, 2018	New Facilities April 1, 2018 to March 31, 2019	Total Facilities
Solar	301	3524	3825
Wind	0	0	0
Solar and Wind	0	0	0
Other	0	0	0
Hydro	0	0	0
Fuel Cell	0	0	0
Total	301	3524	3825

Non-Net Metering Facilities by Resource Type			
Resource	Facilities as of March 31, 2018	New Facilities April 1, 2018 to March 31, 2019	Total Facilities
Solar	17	0	17
Wind	1	0	1
Solar and Wind	0	0	0
Hydro	21	0	21
Thermal	4	0	4
Gas	6	0	6
Fuel Cell	0	0	0
Battery Storage	0	1	1
Total	49	1	50

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Historic to December 31, 2009

The information provided for non-net metering facilities represents the Company's best efforts to identify generation facilities that have been approved and are interconnected to PacifiCorp's distribution system. PacifiCorp has reviewed the generation facilities within the Balancing Authority and eliminated those that are interconnected to third parties or to the Company's transmission system. This list may not be complete because previously there were no requirements to maintain records based upon the point of interconnection with the distribution system.

2. Individual Capacity of Each Installation

See Attachment A

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3. Total kW Combined Capacity

Net Metering Generation Capacity by Resource Type (kW) (Schedule 135)				
Resource	Facilities as of March 31, 2018	New Facilities April 1, 2018 to March 31, 2019	Total Facilities	New Facilities January 1, 2018 to December 31, 2018
Solar	233,481.48	14,158.75	247,640.23	30,359.79
Wind	213.12	0.00	213.12	0.00
Solar and Wind	264.24	0.00	264.24	20.00
Other	0.00	0.00	0.00	0.00
Hydro	103.20	22.92	126.12	22.92
Fuel Cell	15.00	0.00	15.00	0.00
Total	234,077.04	14,181.67	248,258.71	30,402.71

Customer Generation Capacity by Resource Type (kW) (Schedule 136)			
Resource	Facilities as of March 31, 2018	New Facilities April 1, 2018 to March 31, 2019	Total Facilities
Solar	1,924.20	25,847.33	27,771.53
Wind	0.00	0.00	0.00
Solar and Wind	0.00	0.00	0.00
Other	0.00	0.00	0.00
Hydro	0.00	0.00	0.00
Fuel Cell	0.00	0.00	0.00
Total	1,924.20	25,847.33	27,771.53

Non-Net Metering Generation Capacity by Resource Type (MW)			
Resource	Facilities as of March 31, 2018	New Facilities April 1, 2018 to March 31, 2019	Total Facilities
Solar	44.695	0	44.695
Wind	0.04	0	0.04
Solar and Wind	0	0	0
Hydro	36.6	0	36.6
Thermal	42.5	0	42.5
Gas	7.41	0	7.41
Fuel Cell	0	0	0
Battery Storage	0.00	0.25	0.25
Total	131.245	0.25	131.495

4. Number of Expired Credits per Customer

See Attachment A

4a. Net Metering Excess Energy Valuation

See Attachment B

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5. Total Value of Expired Credits (as reported on June 21, 2019)

Expired Credits at End of Annualized Period (Schedule 135)

Customers	kWh	Value	Total Value
30,999	8,371,936	\$0.0183	\$ 153,206.43

Expired Credits at End of Annualized Period (Schedule 136)

Customers	Total Value
3,825	\$ 26,924.55

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6. Excess Net Metering Generation per Month (Schedule 135)

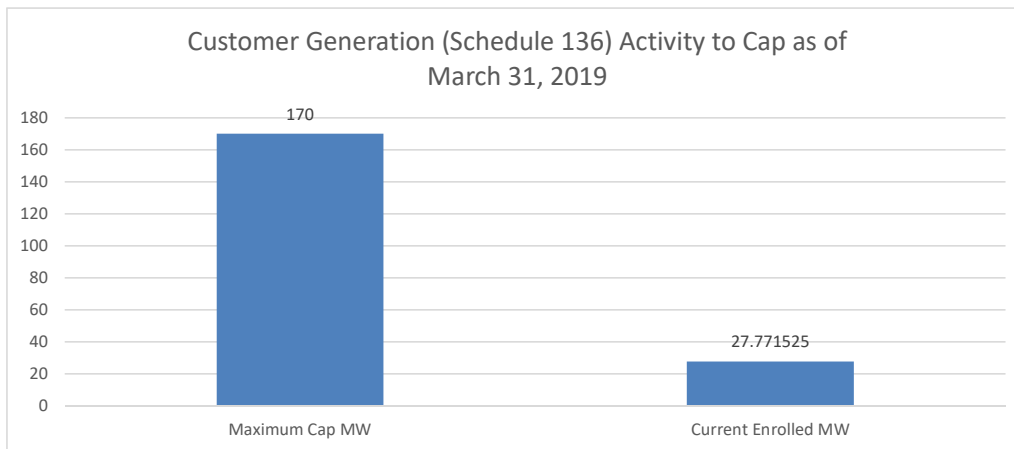
Excess Net Metering Generation per Month- kWh	
Apr-18	1,677
May-18	46,917
Jun-18	478,715
Jul-18	3,127,966
Aug-18	4,647,740
Sep-18	957,101
Oct-18	656,386
Nov-18	2,034,779
Dec-18	6,639,517
Jan-19	5,195,983
Feb-19	2,324,730
Mar-19	846,105

26,957,616

7. Unforeseen Problems or Barriers in the Tariff.

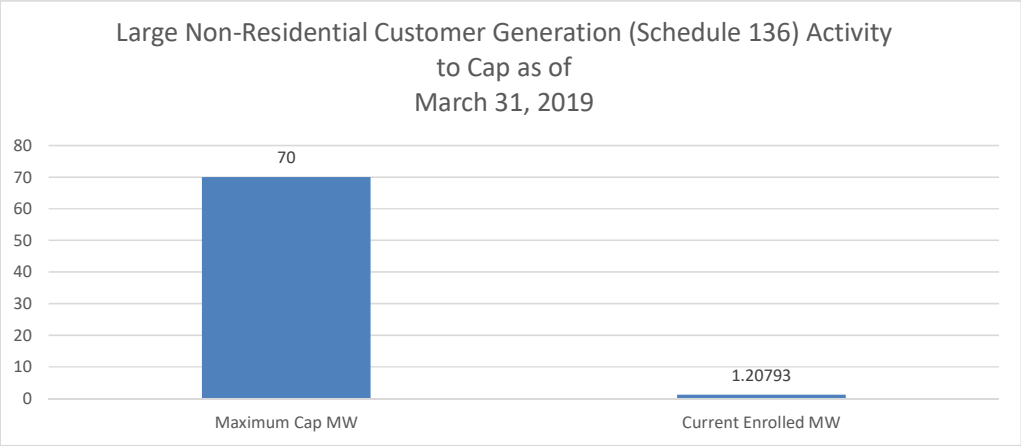
There are no unforeseen problems or barriers.

8. Measurement to Cap



Rocky Mountain Power
Docket 08-035-T04
Customer Generation Report
For the period April 1, 2018 to March 31, 2019

9. Measurement to Cap



Attachment A
to
Rocky Mountain Power's
Customer Owned Generation and Net Metering Report

**THIS ATTACHMENT IS VOLUMINOUS
AND IS PROVIDED IN EXCEL FORMAT
ONLY**

Attachment B
to
Rocky Mountain Power's
Customer Owned Generation and Net Metering Report

Attachment B- 2019 Customer Generation Report

Net Metering Excess Energy Valuation

Onpeak	Hrs
Hrs Per Day (6am to 10pm)	16
Days Per Week	6
Total	96
Offpeak (10pm to 6am)	8
Days	6
Total	48
Sunday	24
Total	72
Total Hours	168
Reconcile 7 * 24	168

Uses volumetric winter and summer energy prices for on-peak and off-peak hours for non-levelized base load facilities

2018 Winter (Apr, May, June) Advice No 17-035-T07	Percent	Sch. 37	Calc	Allocation (3 mo)	cents per kWh
Onpeak Rate	0.57	1.961	1.12	0.25	0.28
Offpeak Rate	0.43	1.741	0.75	0.25	0.19
2018 Summer (Jul, Aug, Sep) Advice No 18-035-T02	Percent	Sch. 37	Calc	Allocation (3 mo)	cents per kWh
Onpeak Rate	0.57	2.286	1.31	0.25	0.33
Offpeak Rate	0.43	1.416	0.61	0.25	0.15
2018 Winter (Oct, Nov, Dec) Advice No 18-035-T02	Percent	Sch. 37	Calc	Allocation (3 mo)	cents per kWh
Onpeak Rate	0.57	1.801	1.03	0.25	0.26
Offpeak Rate	0.43	1.639	0.70	0.25	0.18
2019 Winter (Jan, Feb, Mar) Advice No 18-035-T02	Percent	Sch. 37	Calc	Allocation (2 mo)	cents per kWh
Onpeak Rate	0.57	1.896	1.08	0.25	0.27
Offpeak Rate	0.43	1.660	0.71	0.25	0.18

Total Avoided Cost (per kWh)	\$0.0183
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Annualized Billing Period (12 months) \$	-
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Customer	30,999	8371936
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CERTIFICATE OF SERVICE

Docket No. 19-035-29

I hereby certify that on July 1, 2019, a true and correct copy of the foregoing was served by electronic mail to the following:

Utah Office of Consumer Services

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dpudatarequest@utah.gov

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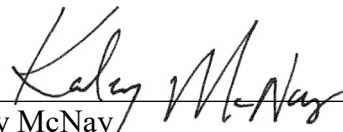
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Rocky Mountain Power

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Kaley McNay
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