



State of Utah
Department of Commerce
Division of Public Utilities

FRANCINE GIANI
Executive Director

CHRIS PARKER
Director, Division of Public Utilities

GARY HERBERT
Governor

SPENCER J. COX
Lieutenant Governor

REPLY COMMENTS

To: Utah Public Service Commission

From: Division of Public Utilities
Chris Parker, Director
Artie Powell, Energy Section Manager
Bob Davis, Utility Technical Consultant

Date: August 15, 2019

Re: **Acknowledge, Docket No. 19-035-29** – In the Matter of Rocky Mountain Power’s Customer Owned Generation and Net Metering Report and Attachment A for the Period April 1, 2018 through March 31, 2019.

RECOMMENDATION (Acknowledge with Recommendation)

The Division of Public Utilities (“Division”) has reviewed Rocky Mountain Power’s (“RMP”) Customer Owned Generation and Net Metering Report and Attachment A for the annualized billing period ending March 31, 2019 and finds that it complies with the Public Service Commission’s (“Commission”) reporting requirements. The Division recommends the Commission direct RMP to update its Interconnection Report to clarify numbers between it and Attachment A for certain sections and refile it with the Commission. The Division also recommends that RMP add a table to Section 6 in its report illustrating the “Monthly Export in kWh” for Schedule 136 customers. The Division supports RMP’s proposal to credit the surrendered Schedule 135 excess credits on a monthly basis.

ISSUE

On July 1, 2019, RMP filed its 2019 Net Metering Report and Attachment A (“Report”) with the Commission and the Commission issued an action request to the Division to review the filing for compliance and make recommendations. On July 2, 2019, the Commission issued a Notice of Filing and Comment Period whereby any interested party may submit comments on or

before July 31, 2019, with reply comments on or before August 15, 2019. The Division filed its comments in response to the Commission's Action Request on July 31, 2019 citing several data requests that RMP had not responded to at the time of the filing. The Division respectfully submits the following reply comments after its analysis of RMP's responses to those data requests.

DISCUSSION

The Division's goal for the annual Net Metering Report is to ensure the accuracy of the status of the program relied upon by stakeholders for various purposes. The Division's review of this year's filing found several discrepancies between its analysis and that reported by RMP. In response to data requests from both the Division and the Office of Consumer Services ("OCS"), RMP acknowledged or provided support for those discrepancies. The Division respectively updates the following from its initial review of this year's annual report.

In response to OCS Data Request 2.1, RMP provides an Updated 2019 Utah Interconnection Report for the reporting period of April 1, 2018 through March 31, 2019 clarifying many of the Division's noted discrepancies. The Division asked RMP in DPU Data Request 2.1, to explain the total facilities number of 29,763 solar generators and 4 total Hydro generators. The Division's analysis from Attachment A illustrates a total generation from Solar of 30,921 and 7 Hydro generators.¹ RMP's response to DPU 2.1 does not convince it of the accuracy of the number provided for Solar generation.

DPU Data Request 2.1

In reference to RMP Exhibit C – Interconnection Report 7-1-2019, Section 1, please explain how the 29,763 of reported total Schedule 135 Solar facilities was determined. Please provide response in Excel format with intact formulae.

Response to DPU Data Request 2.1

The value of 29,763 (Total Facilities) was determined by using the (Facilities as of March 31, 2018-Solar) column and adding it to the (New Facilities April 1, 2018 to March 31, 2019-Solar).

¹ The Division analyzed Attachment A using a Pivot table to sort for total NEM generation for each technology type to date.

RMP's response to DPU 2.2 does not convince it of the accuracy of the number provided for Hydro generation.²

DPU Data Request 2.2

In reference to RMP Exhibit C – Interconnection Report 7-1-2019, Section 1, please provide the support for the reported 4 Schedule 135 Hydro facilities in Excel format with intact formulae.

Response to DPU Data Request 2.2

Please refer to Attachment DPU 2.2 for support for (Facilities as of March 31, 2018-Hydro). In order to retrieve these same results in 135 – Appendix A, the attachment should be filtered by correct date (Facilities as of March 31, 2018) and also filter to include Hydro and Net Metering.

The Division is interested in the total Hydro generation as of March 31, 2019, not March 31, 2018. In response to OCS 2.1, RMP corrects the 4 Hydro generators reported to a total of 7 Hydro generators in its Updated Interconnection Report.

In response to DPU Data Requests 2.3 through 2.7, the Non-Net Metering changed from last year's revised count of 52 to 53 with the addition of the battery storage customer and a total Non-Net Metering MW of 132.64 MW.³ RMP explained in its responses to the Division's data requests that it inadvertently pulled data from 2016 as its basis rather than 2017 resulting in errors in the report. RMP did not provide an adequate response to DPU Data Request 2.7 to explain the battery storage customer.⁴

DPU Data Request 2.7

In reference to RMP Exhibit C – Interconnection Report 7-1-2019, Section 3, please explain the .25 MW of Battery Storage facilities in Excel format with intact formulae.

Response to DPU Data Request 2.7

The data submitted in the 2018 report was inadvertently built upon the 2016 report, rather than the 2017 report resulting in an error in the report. Refer to Attachment DPU 2.3.

² Id.

³ Id. RMP's response to OCS Data Request 2.1, Updated 2019 Interconnection Report, July 30, 2019.

⁴ The Division's analysis of Attachment A using Pivot tables for Non-NEM customers does not show any record of a battery storage customer.

Based on RMP's responses to the Division's and OCS's data requests, the Division recommends the Commission direct RMP to review its Attachment A and Interconnection Report for accuracy and refile both Attachment A (if needed) and the Interconnection Report or provide better explanation for the discrepancies discussed above.

CONCLUSION

The Division has reviewed RMP's 2019 Customer Generation Net Metering Report, Attachments A and B, responses to Division and OCS data request, and concludes that RMP's filing complies with the Commission's reporting requirements. However, the Division recommends the Commission direct RMP to re-evaluate its Interconnection Report and Attachment A for clarity and refile if needed. The Division recommends that RMP add a table to Section 6 in its report illustrating the "Monthly Export in kWh" for Schedule 136 customers. The Division supports RMP's proposal to credit the surrendered Schedule 135 excess credits on a monthly basis. The Division recommends the Commission acknowledge RMP's Customer Owned Generation Net Metering Report and Attachment A conditioned upon the above.

cc: Joelle Steward, RMP
Jana Saba, RMP
Michele Beck, OCS
Service List