

August 15, 2019

***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 Administrator

**RE: Docket No. 19-035-29**  
Rocky Mountain Power's Customer Owned Generation and Net Metering Report  
and Attachment A for the Period April 1, 2018 through March 31, 2019  
*Reply Comments*

On July 2, 2019 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 1, 2019 Customer Owned Generation Net Metering Report and Attachment A for the period April 1, 2018 through March 31, 2019 ("Report"). On July 31, 2019, the Division of Public Utilities ("Division") and the Office of Consumer Services ("Office") filed comments. Consistent with the Notice, the Company submits reply comments below.

***Reporting Enhancements and Corrections***

The Division recommends that the Commission acknowledge the Report, concluding that it meets the Commission's reporting requirements. The Division further recommends that the Company add a table to Section 6 in future reports illustrating total export credits in kWh for each month for customers under Electric Service Schedule No. 136 – Transition Program for Customer Generators ("Schedule 136"). Per Schedule 136, the credit value for the excess credit is computed as a monetary value in the Company's system for billing purposes, as opposed to kWh value that are used under Electric Service Schedule No. 135 – Net Metering Service ("Schedule 135"). Once the Company's system converts the kWh values into monetary values for Schedule 136, it does not retain the kWh information. The Company included this information for Schedule 136 in its 2018 report in Docket No. 18-035-28, but that information was calculated manually, which was manageable due to the very few customers on Schedule 136 at the time. At the Division's request, the Company performed this calculation and the information is provided in the revised Report and Attachment A that accompanies this filing as discussed below.

The Office also recommends the Commission acknowledge the Report as meeting the compliance requirements, but noted some discrepancies and recommended the Company address the issues noted and provide a corrected Attachment B. The Company revised the Report, Attachment A and Attachment B to address the issues raised by the Division and Office both comments and through discovery. The revised versions are provided with these reply comments.

With one exception, the discrepancies noted by the Division and Office have been corrected in the revised Attachments.

The Office noted differences in the reported numbers for Solar and Wind (mixed) facilities between 2017 Report (25) and the 2018 Report (20). The Company confirms these numbers are accurate. The changes for the 5 customers are attributable to either being inactive during the reporting period, having their solar disconnected or a change in the resource type from mixed to solar.

***Schedule 135 Credits***

In the cover letter accompanying the Report, the Company proposed the the value of excess generation credits from Schedule 135 continue to be credited to the Home Electric Lifeline Program (“HELP”), and the current monthly credit of \$12.60 be permanently increased by \$0.54 to pass the value of the excess generation credits to the Company’s low-income customers. The Division and the Office supported the Company’s proposal and no party filed comments opposing it. The Company requests the Commission approve the proposal and direct the Company to make a compliance tariff filing to update Electric Service Schedule No. 3, Low Income Lifeline Program - Residential Service, to reflect the new maximum monthly low income lifeline credit amount of \$13.14.

Sincerely,



Joelle Steward  
Vice President, Regulation

CC: Service List - Docket No. 19-035-29

Rocky Mountain Power's

Revised 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**

*(Revised 8/15/2019, changes from July 1, 2019 version are highlighted)*

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

<b>Net Metering Facilities by Resource Type (Schedule 135)</b>				New Facilities January 1, 2018 to December 31, 2018
Resource	Facilities as of March 31, 2018	New Facilities April 1, 2018 to March 31, 2019	Total Facilities	
Solar	29758	1163	30921	1993
Wind	50	0	50	0
Solar and Wind	20	0	20	1
Other	0	0	0	0
Hydro	4	3	7	0
Fuel Cell	1	0	1	0
<b>Total</b>	<b>29833</b>	<b>1166</b>	<b>30999</b>	<b>1994</b>

<b>Customer Generation Facilities by Resource Type (Schedule 136)</b>			
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
<b>Total</b>	<b>301</b>	<b>3524</b>	<b>3825</b>

<b>Non-Net Metering Facilities by Resource Type</b>			
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	22	0	22
Thermal	4	0	4
Gas	8	0	8
Fuel Cell	0	0	0
Battery Storage	0	1	1
<b>Total</b>	<b>52</b>	<b>1</b>	<b>53</b>

**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

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

**3. Total kW Combined Capacity**

<b>Net Metering Generation Capacity by Resource Type (kW) (Schedule 135)</b>				
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
<b>Total</b>	<b>234,077.04</b>	<b>14,181.67</b>	<b>248,258.71</b>	<b>30,402.71</b>

<b>Customer Generation Capacity by Resource Type (kW) (Schedule 136)</b>			
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
<b>Total</b>	<b>1,924.20</b>	<b>25,847.33</b>	<b>27,771.53</b>

<b>Non-Net Metering Generation Capacity by Resource Type (MW)</b>			
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	36.9	0	36.9
Thermal	42.5	0	42.5
Gas	8.255	0	8.255
Fuel Cell	0	0	0
Battery Storage	0.00	0.25	0.25
<b>Total</b>	<b>132.39</b>	<b>0.25</b>	<b>132.64</b>

**4. Number of Expired Credits per Customer**  
See Attachment A

**4a. Net Metering Excess Energy Valuation**  
See Attachment B

**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	kWh	Total Value
3,825	294,138	\$ 26,924.55

**Rocky Mountain Power**  
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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	

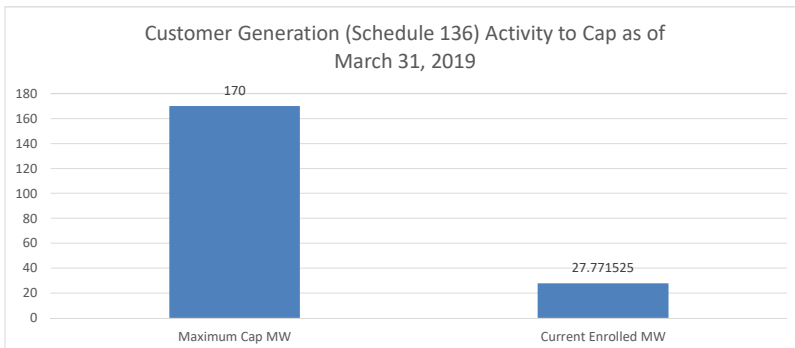
**Exported Customer Generation per Month (Schedule 136)**

Exported Customer-Generated Energy per Month (Schedule 136)	
Apr-18	92,260
May-18	225,281
Jun-18	394,128
Jul-18	478,841
Aug-18	460,244
Sep-18	739,397
Oct-18	864,121
Nov-18	899,784
Dec-18	569,732
Jan-19	460,096
Feb-19	634,923
Mar-19	1,097,289
6,916,096	

**7. Unforeseen Problems or Barriers in the Tariff.**

There are no unforeseen problems or barriers.

**8. Measurement to Cap**



Revised 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**



Revised 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
<b>Total</b>	<b>96</b>
Offpeak (10pm to 6am)	8
Days	6
<b>Total</b>	<b>48</b>
Sunday	24
<b>Total</b>	<b>72</b>
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 August 15, 2019, a true and correct copy of the foregoing was served by electronic mail to the following:

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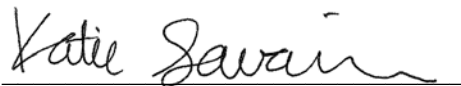
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**Rocky Mountain Power**

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