

September 18, 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: **Supplemental Filing**
In the Matter of Rocky Mountain Power's Proposed Changes to Schedule 73,
Subscriber Solar Program Rider Optional
Docket No. 19-035-T08

BACKGROUND

On May 10, 2019, the Public Service Commission of Utah (“Commission”) issued a Notice of Filing and Comment period in the above referenced matter, allowing parties to file comments and reply comments by May 23 and 30, 2019, respectively. The Office of Consumer Services (“OCS”) filed comments May 21, 2019, and the Division of Public Utilities (“DPU”) and Utah Association of Energy Users (“UAE”) filed comments May 23, 2019.

Rocky Mountain Power (the “Company”) provided reply comments May 30, 2019, supporting a suspension order to allow time to work with parties off the record to schedule workshops and address concerns. Once the workshops were completed, the intent was to submit supplemental information in this docket, update elements of the Company’s proposed changes, if necessary, and have a second round of comments. The Commission issued an Order Suspending Tariff on May 31, 2019, suspending the Company’s proposed changes to Schedule 73 in this docket pending further order from the Commission.

A workshop was held July 12, 2019 with interested parties to address the concerns in this docket. The Company provided and discussed additional information, including why customers enroll in the Subscriber Solar Program, proposed refinements, further details on the proposed 100 percent subscription option, solar coverage, and subscription modeling. The Company also had several correspondences and calls with individual parties after the workshop to answer questions. The workshop presentation and 100 percent block subscription proposal are attached hereto as Exhibits A and B. Confidential workpapers that support Exhibits A and B are also attached.

PROPOSED CHANGES

As a result of the workshop and discussions held with parties, the Company withdraws its proposal to remove Schedule Nos. 2, 8, 9, and 9A from the Schedule 73 tariff. Additionally, the Company is updating its requested effective date for proposed changes to be January 1, 2020. Attached hereto as Exhibit C are updated tariff sheets that reflect these revisions. The Company states that the revised tariff sheets in Exhibit C do not constitute a violation of state law or Commission rule.

Given the Company's additional materials and updates to its proposed changes, the Company respectfully requests the Commission allow for a second round of comments in this docket to allow parties the opportunity for additional feedback.

Sincerely,

A handwritten signature in blue ink that reads "Michael S. Snow". The signature is written in a cursive style with a long, sweeping underline.

Michael S. Snow
Manager, Regulatory Affairs

Exhibit A



Subscriber Solar – 100% Coverage Option

*Stakeholder Workshop
July 12, 2019*





Why customers enroll



Build a better future

- Diversify regional energy sources
- Reduce fossil fuel dependency



Protect the environment

- Reduce your carbon footprint
- Preserve natural resources



Support your community

- Encourage new development of local and regional renewable energy projects

Other motivators:

- Limited availability
- Part of a “Community”
- Potential savings



PROPOSED REFINEMENTS

1. Suspend offering to customers under Schedules 2, 8 and 9 due to lack of interest that has been expressed in subscribing to the program since it was offered more than 3 years ago
2. Program Improvement of adding a 100% option to Residential and Small Commercial Customers, in addition to the current 200 kWh block option



Rate Schedule Suspension: Purpose

- Schedule 2
- Low customer count: 385 (as of June 30, 2019)
- System billing would be manual for this schedule, which would increase the administration costs in the future; proposed removing since no customers have expressed interest in the program
- Schedules 8 and 9
- Subscriber Solar rate is between 1.3 cents and 3 cents higher per kWh than the customers normal rate, depending upon the usage timeframe; other products are available for this rate class (Schedule 32 and Schedule 34) which is much more economically viable
- System billing would be manual for this schedule (Schedule 32) which could increase the administration costs
- No customers have expressed interest to the company as of July 2019 (3 years since program offering opened)
- This is the Company's 2nd request to refine the Subscriber Solar program's eligible rate schedules to align with actual customer demand; this item is primarily considered a housekeeping item, not intended to create barriers for customers
- Company will remove this requested change based on the comments received from stakeholders and continue to work on refinements to the program to attract these customers in the future



100% Option: Purpose

- Customers want this option – several requests and survey results indicate moderate interest
- Customers can achieve 100% through installation of their own solar panels
- Adding the 100% option to small users does not add a financial or operational burden to the program
- Some customers are paying for power that they are unable to use (donation at anniversary month)
- More options are becoming available in some cities and the program needs to be able to offer customers another, self-directed solution
- Adding this option will help the program stay fully subscribed, reducing the unsold generation and costs that are recovered from all customers through the EBA
- A similar program is already in place, specifically for residential and small commercial users through Blue Sky Usage in Oregon and has proven to be popular

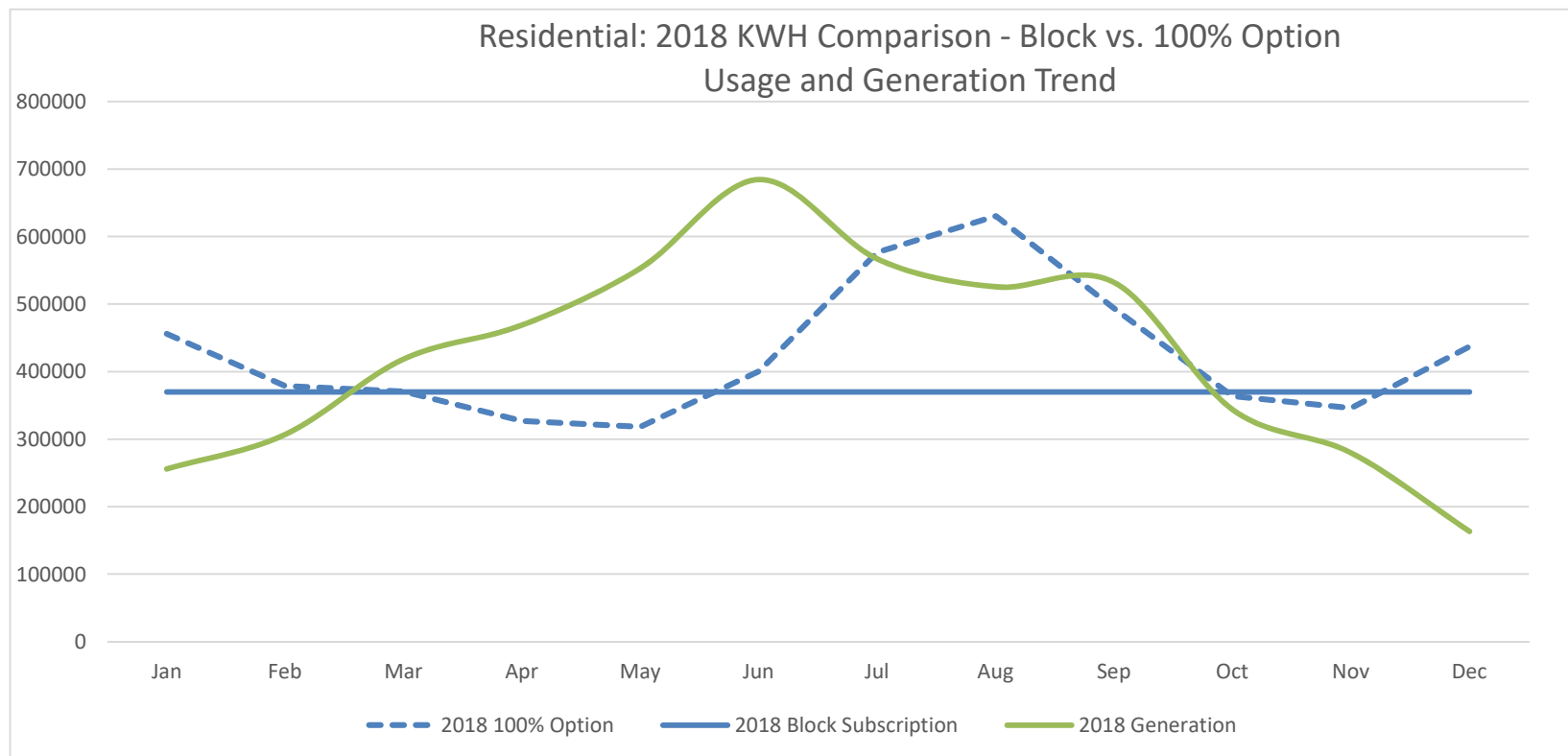


100% Option: Objections

- Customers want this option – several requests and survey results indicate moderate interest
 - Customers can get it on their own through installation of their own solar panels
 - Adding the 100% option to small users does not add a financial or operational burden to the program
 - Some customers are paying for power that they are unable to use (donation at anniversary month)
 - More options are becoming available to some cities and the program needs to be able to give customers another, self-directed solution
 - Adding this option will help the program stay fully subscribed, reducing the unsold generation and costs that are recovered from all customers through the EBA
 - A similar program is already in place for small users through Blue Sky Usage in Oregon and has proven to be popular with environmental advocates
- “Fairness” to other customers under larger commercial rate schedules
 - Rate design – should 100% cost more? How are program mechanics impacted?
 - Oversubscription risk
 - Misleading customers to believe they can be 100% green
 - Does moving additional costs to later years negatively impact program cost model?
- Others?
-

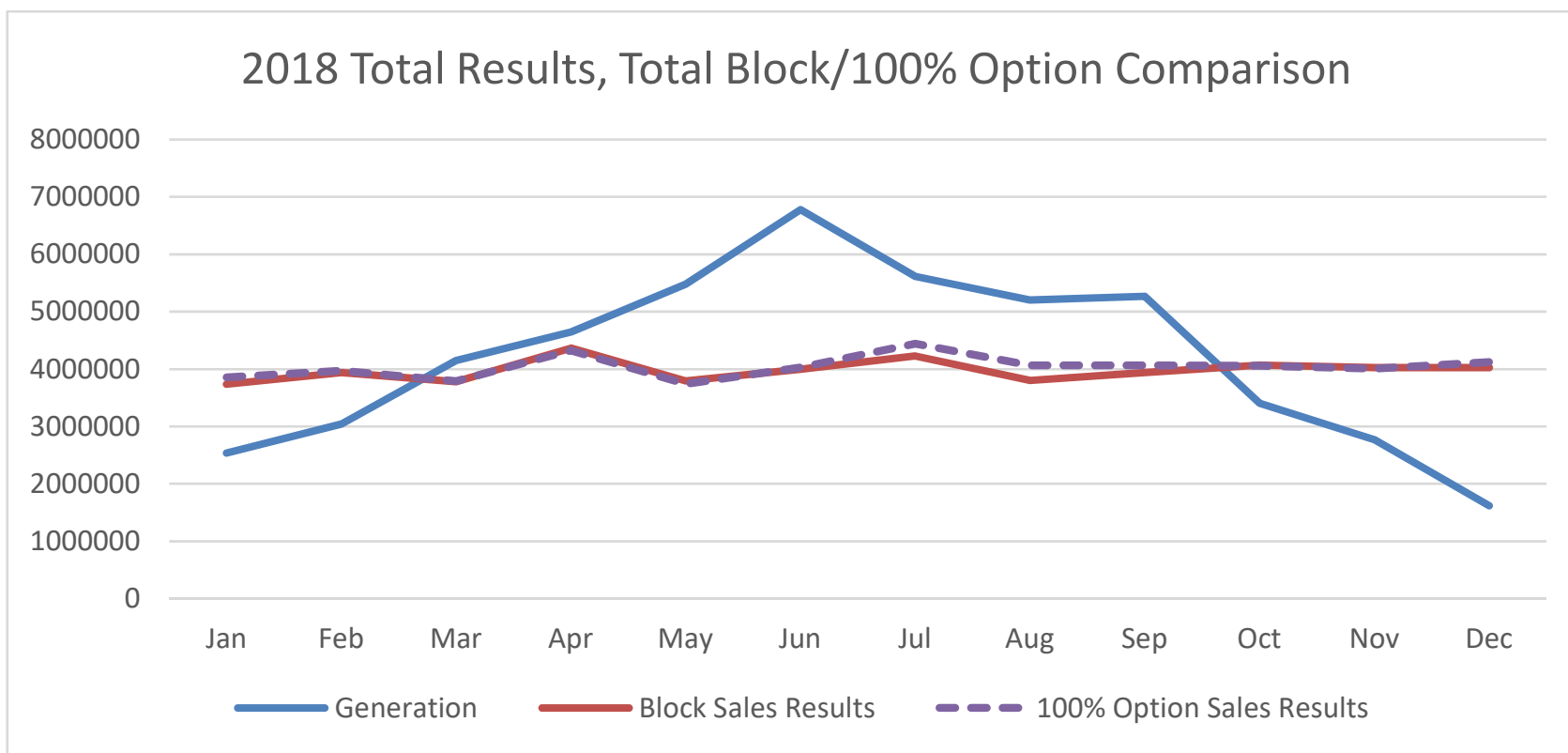


100% Solar Coverage





2018 – Zoom Out Comparison



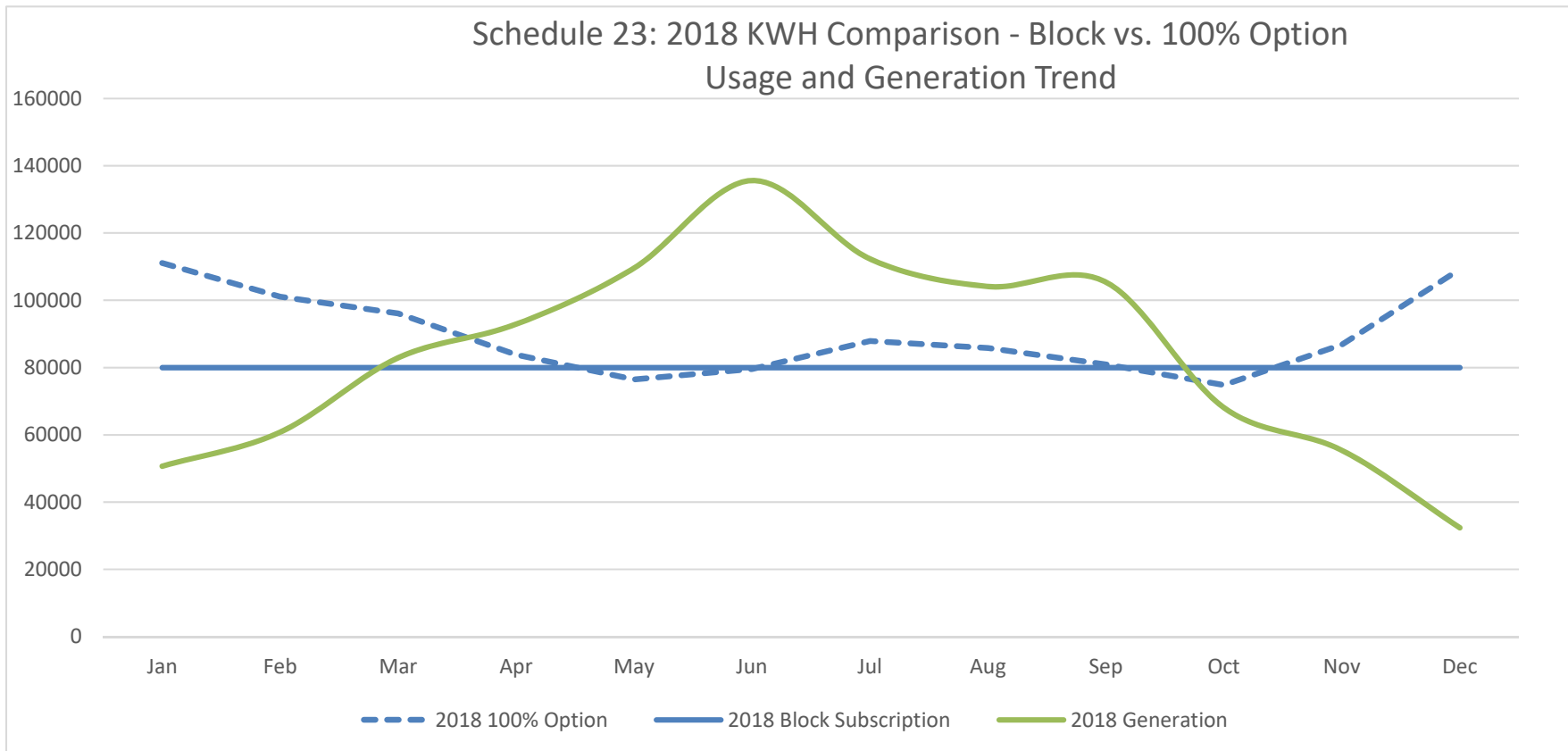


Subscription Modeling

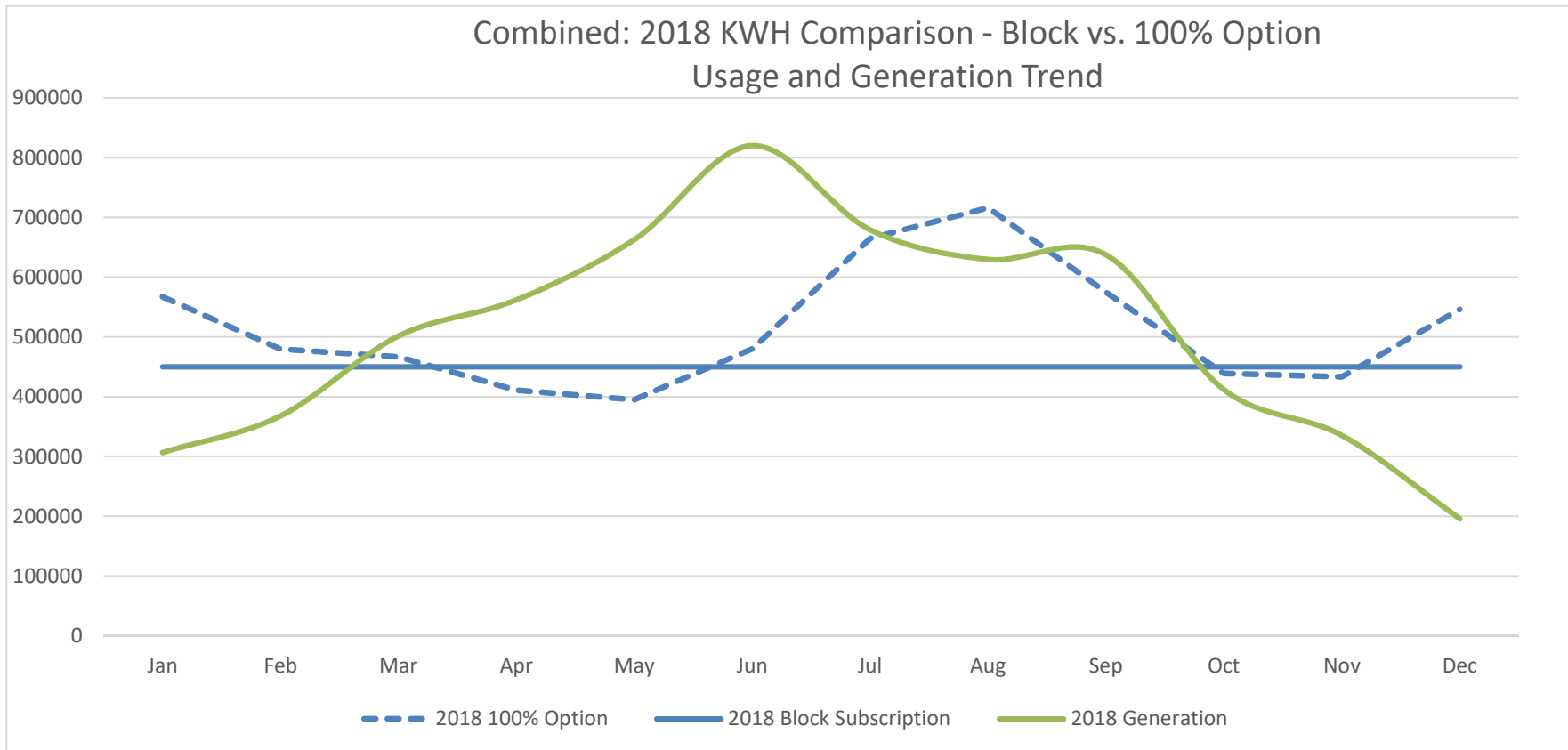
						Normal Bill			Subscriber Solar Bill				Bank Balances					
12-Month Usage		Normal Bill (usage only)	Excess Solar	Subscriber Solar Bill (usage only)	Variance	Tier 1	Tier 2	Tier 3	Solar	Tier 1	Tier 2	Tier 3	Excess Solar Purchased	Banked Energy	Usage Avail for Bank	Bank Applied	Bank Balance	Adjusted Bank Read
Jan	665	\$ 63.77	✓	\$ 93.62	\$ 29.85	400	265		800	0	0		135	135	0	0	135	665
Feb	718	\$ 69.45	✓	\$ 93.62	\$ 24.18	400	318		800	0	0		82	217	0	0	217	718
Mar	702	\$ 67.73	✓	\$ 93.62	\$ 25.89	400	302		800	0	0		98	315	0	0	315	702
Apr	620	\$ 58.96	✓	\$ 93.62	\$ 34.67	400	220		800	0	0		180	495	0	0	495	620
May	604	\$ 58.95	✓	\$ 93.62	\$ 34.68	400	204	0	800	0	0	0	196	691	0	0	691	604
Jun	1015	\$ 106.82		\$ 93.62	\$ (13.20)	400	600	15	800	215	0	0	0	691	215	215	476	800
Jul	1255	\$ 141.51		\$ 93.62	\$ (47.88)	400	600	255	800	400	55	0	0	476	455	455	21	800
Aug	1458	\$ 170.84		\$ 156.38	\$ (14.46)	400	600	458	800	400	258	0	0	21	658	21	0	1437
Sep	1300	\$ 148.01		\$ 140.57	\$ (7.44)	400	600	300	800	400	100	0	0	0	500	0	0	1300
Oct	801	\$ 78.34		\$ 93.71	\$ 15.38	400	401		800	1	0		0	0	1	0	0	801
Nov	656	\$ 62.81	✓	\$ 93.62	\$ 30.81	400	256		800	0	0		144	144	0	0	144	656
Dec	715	\$ 69.13	✓	\$ 93.62	\$ 24.50	400	315		800	0	0		85	229	0	0	229	715
Total	10509	\$ 1,096.31		\$ 1,233.27	\$ 136.96	4800	4681	1028	9600	1416	413	0						
Avg Monthly	876	\$ 91.36		\$ 102.77	\$ 11.41	400	390	206	800	118	34	0						

Unused Credits

Schedule 23



Combined: Residential and Schedule 23



Additional Analysis Needs



Exhibit B

Subscriber Solar Program: 100% Coverage Option Proposal

Recommendation Summary

In an effort to meet growing customer demands in the renewable energy sector and to better align with market conditions, the Company is proposing to enable residential and small commercial customers in the Subscriber Solar program to participate in a 100% coverage/offset option. The current program allows customers to subscribe to blocks of 200 kWh up to their annual usage. However, the current offering does not allow customers to offset all of their usage unless customer’s usage is exactly the same as their subscription. The result is that many customers are unable to use all of the energy they purchase during a year while on the program. We are recommending that this change be effective January 1, 2020.

This proposed change would apply to the eligible rate schedules as shown below (Table 1).

Table 1. Subscriber Solar Rate Schedules

Rate Schedule	Block Program	100% Option
Residential Schedule 1	Yes	Yes
Residential Schedule 2	Yes	Yes
Residential Schedule 3	Yes	Yes
Residential Gen Svc 23	Yes	Yes
Commercial Schedule 23	Yes	Yes
Commercial Schedule 6	Yes	No
Commercial Schedule 6A	Yes	No
Commercial Schedule 8	Yes	No
Commercial Schedule 9	Yes	No

In order to implement this new offering, the program would need to invest approximately \$250,000 in I/T system billing modifications. The funds that were originally budgeted for the implementation of the program are still currently available and it is the Company’s opinion that spending a portion of the existing funds to enable this new offering would provide additional benefits to existing participants and be an attractive added feature for future Subscribers.

The purpose, drivers, risks and impacts for this proposed change were analyzed and results are presented in this business case to enable management to make an informed decision on this recommendation.

Purpose: Meeting Participant Desires, Reducing Customer Costs

Adding the 100% coverage option to the schedules that typically have lower usage does not result in a negative impact on the financial status of the program, and can be managed operationally with existing resources.

Based on requests received directly from customers and responses received from a customer survey, it is estimated that approximately 500 residential participants may choose the 100% option over the 200-kilowatt-hour block option, which represents approximately 22% of the total residential participants.

The billing example below shows a typical customer's usage pattern, subscribed to 4 blocks (91% of their average annual usage). This customer was unable to use their credits of 229 kilowatt-hours at the end of the year.

					Normal Bill			Subscriber Solar Bill				Bank Balances						
12-Month Usage		Normal Bill (usage only)	Excess Solar	Subscriber Solar Bill (usage only)	Variance	Tier 1	Tier 2	Tier 3	Solar	Tier 1	Tier 2	Tier 3	Excess Solar Purchased	Banked Energy	Usage Avail for Bank	Bank Applied	Bank Balance	Adjusted Bank Read
Jan	665	\$ 63.77	✓	\$ 93.62	\$ 29.85	400	265		800	0	0		135	135	0	0	135	665
Feb	718	\$ 69.45	✓	\$ 93.62	\$ 24.18	400	318		800	0	0		82	217	0	0	217	718
Mar	702	\$ 67.73	✓	\$ 93.62	\$ 25.89	400	302		800	0	0		98	315	0	0	315	702
Apr	620	\$ 58.96	✓	\$ 93.62	\$ 34.67	400	220		800	0	0		180	495	0	0	495	620
May	604	\$ 58.95	✓	\$ 93.62	\$ 34.68	400	204	0	800	0	0	0	196	691	0	0	691	604
Jun	1015	\$ 106.82		\$ 93.62	\$ (13.20)	400	600	15	800	215	0	0	0	691	215	215	476	800
Jul	1255	\$ 141.51		\$ 93.62	\$ (47.88)	400	600	255	800	400	55	0	0	476	455	455	21	800
Aug	1458	\$ 170.84		\$ 156.38	\$ (14.46)	400	600	458	800	400	258	0	0	21	658	21	0	1437
Sep	1300	\$ 148.01		\$ 140.57	\$ (7.44)	400	600	300	800	400	100	0	0	0	500	0	0	1300
Oct	801	\$ 78.34		\$ 93.71	\$ 15.38	400	401		800	1	0		0	0	1	0	0	801
Nov	656	\$ 62.81	✓	\$ 93.62	\$ 30.81	400	256		800	0	0		144	144	0	0	144	656
Dec	715	\$ 69.13	✓	\$ 93.62	\$ 24.50	400	315		800	0	0		85	229	0	0	229	715
Total	10509	\$ 1,096.31		\$ 1,233.27	\$ 136.96	4800	4681	1028	9600	1416	413	0						
Avg Monthly	876	\$ 91.36		\$ 102.77	\$ 11.41	400	390	206	800	118	34	0						

The same customer is compared below, subscribed to the 100% option. This customer is able to use all of the solar credits purchased each month, and paid a total of \$3.40 less (annual) by subscribing to the program at 100%.

					Normal Bill			Subscriber Solar Bill				
12-Month Usage		Normal Bill (usage only)	Excess Solar	Subscriber Solar Bill (usage only)	Variance	Tier 1	Tier 2	Tier 3	Solar	Tier 1	Tier 2	Tier 3
Jan	665	\$ 63.77		\$ 77.82	\$ 14.05	400	265		0	400	265	
Feb	718	\$ 69.45		\$ 84.03	\$ 14.58	400	318		0	400	318	
Mar	702	\$ 67.73		\$ 82.16	\$ 14.42	400	302		0	400	302	
Apr	620	\$ 58.96		\$ 72.56	\$ 13.60	400	220		0	400	220	
May	604	\$ 58.95		\$ 70.69	\$ 11.74	400	204	0	0	400	204	0
Jun	1015	\$ 106.82		\$ 118.79	\$ 11.96	400	600	15	0	400	600	15
Jul	1255	\$ 141.51		\$ 146.87	\$ 5.37	400	600	255	0	400	600	255
Aug	1458	\$ 170.84		\$ 170.63	\$ (0.21)	400	600	458	0	400	600	458
Sep	1300	\$ 148.01		\$ 152.14	\$ 4.13	400	600	300	0	400	600	300
Oct	801	\$ 78.34		\$ 93.74	\$ 15.41	400	401		0	400	401	
Nov	656	\$ 62.81		\$ 76.77	\$ 13.96	400	256		0	400	256	
Dec	715	\$ 69.13		\$ 83.68	\$ 14.55	400	315		0	400	315	
Total	10509	\$ 1,096.31		\$ 1,229.87	\$ 133.56	4800	4681	1028	0	4800	4681	1028
Avg Monthly	876	\$ 91.36		\$ 102.49	\$ 11.13	400	390	206	0	400	390	206

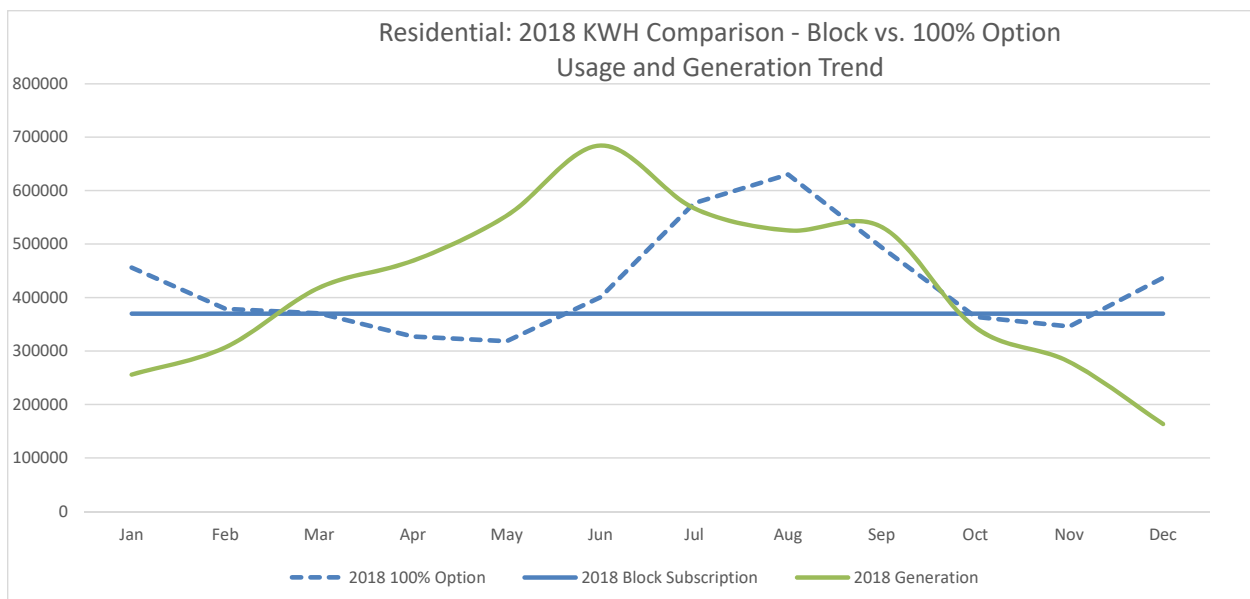
Each customer's subscription and outcome will be different, however an analysis was completed of all residential customers currently subscribed above 75% during 2018 (527 total dataset). The analysis shows that if all 527 customers would have been subscribed at the 100% option, the total impact to revenue would have been less than \$300. In addition, customers would have been subscribed to approximately 659,000 more kWh, which would have reduced the amount charged to the EBA, which are costs passed to all non-participating customers. This

dataset also shows that the kilowatt-hour donation to the low income assistance program would have been reduced by approximately 9% (146,000 kilowatt-hours).

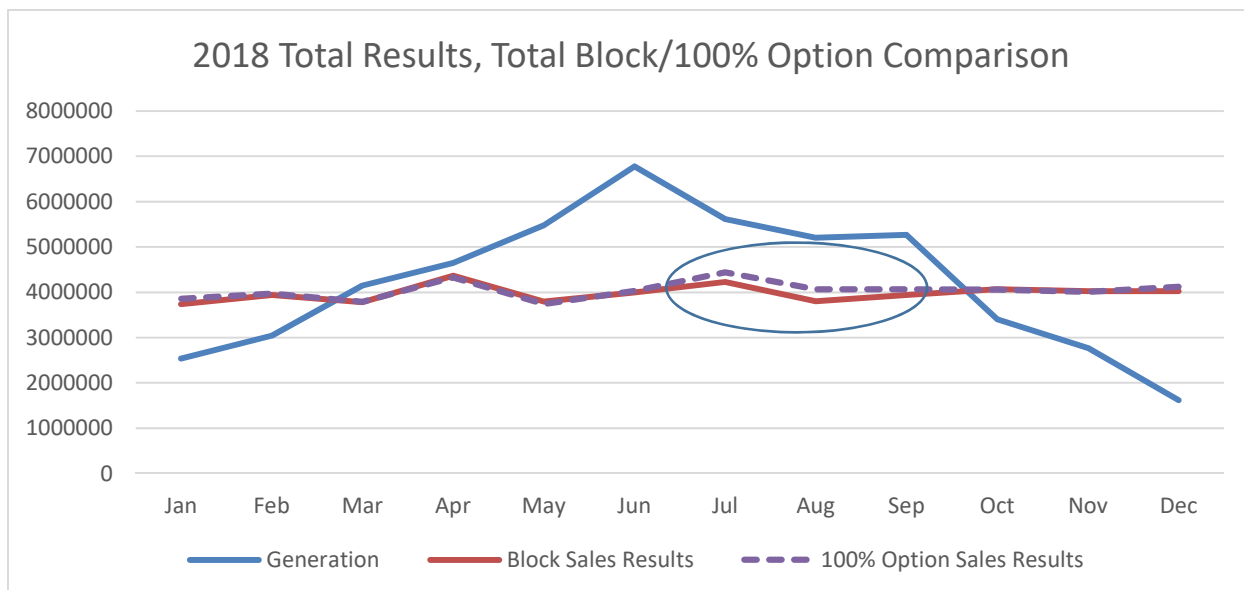
A similar analysis was performed on a dataset of 119 Schedule 23 customers, using the same parameters and threshold of greater than 75% subscription rate. The Schedule 23 analysis showed a total reduction in revenue collected from customers of approximately \$6,636, and an additional reduction of 113,644 kilowatt-hours charged to the EBA. There would have been approximately 54,000 fewer kilowatt-hours donated to the low income assistance program by Schedule 23 participants. The overall economic outcome of the 100% offering for both program participants and non-participants is positive based on these analyses.

Risk: Oversubscription

Utilizing the same dataset described above, a model was created to determine if any significant risk of oversubscription would result from offering the 100% option to customers. The chart below compares the differences between the actual customer-block-purchases in 2018, the generation curve for the value subscribed, and the proposed 100% option. The analysis of this model shows that the 100% option more closely matches customer consumption during the higher generation months.



When the above chart is zoomed back out to see the comparison to all subscriptions, the differences are much less noticeable, as shown below.



The total difference of subscription block rate to the 100% option for the entire dataset is less than 1.7% of the annual generation. This small variance does not pose a critical risk of oversubscription in the same calendar year that customers purchase the solar. The program management performs a monthly forecast and reconciliation of generation versus sales that would identify any low-generation coverage early in the year and could adapt enrollments as necessary through controls placed on back-filling cancelled subscriptions (waitlist fulfillment process).

Next Steps:

- Receive support from external stakeholders.
- Submit and receive approval of revised tariff language to Commission.
- Launch I/T project to update Subscriber Solar screens in billing system to accommodate change.
- Create and implement communications strategy plan and update all related collateral by December 31, 2019
- Launch program change January 1, 2020.

Supporting Work Papers:

SubSolar100 Analysis Builder 11Jul2019.xlsx

Exhibit C



P.S.C.U. No. 50

~~First~~Second Revision of Sheet No. 73.1
Canceling ~~Original~~First Revision of Sheet No. 73.1

ROCKY MOUNTAIN POWER
ELECTRIC SERVICE SCHEDULE NO. 73

STATE OF UTAH

Subscriber Solar Program Rider - Optional

PURPOSE: This Schedule is a voluntary program for Customers to purchase electricity from solar resources.

AVAILABILITY: At any point on the Company's interconnected system.

APPLICATION: On a first-come, first-served basis to any customer receiving service under the Company's Electric Service Schedules 1, 2, 3, 6, 6A, 6B, 8, 9, 9A and 23.

SUBSCRIBER SOLAR ENERGY BLOCK OPTION: Customers can purchase 1-kW blocks of capacity (and associated energy) in the Subscriber Solar Program resource: For Schedules 1, 2, 3, 23, and Schedules 6, 6A and 6B where the customer does not have an interval meter, the block of capacity will be assigned a fixed amount of energy of 200 kWh per month. For Schedules 8, 9, 9A, and Schedules 6, 6A and 6B where the customer does have an interval meter, the energy amount for each block will be based on the actual output of the solar resource (i.e. the actual output associated with their 1-kW block).

SUBSCRIBER SOLAR ENERGY FULL COVERAGE OPTION: Customers can purchase variable blocks of capacity (and associated energy) in the Subscriber Solar Program resource: For Schedules 1, 3 and 23, the block of capacity will be assigned a variable amount of energy equal to 100% of their total usage per month, reconciled on an annual basis. The full coverage option is not available for Schedules 2, 6, 6A, 6B, 8, 9 or 9A.

SOLAR ENERGY ~~BLOCK~~ CHARGES:

<u>Schedule</u>	<u>Solar Block-Delivery Charge</u>	<u>Solar Block-Generation Charge</u>
1, 2, 3	3.9783 ¢ per kWh	7.7250 ¢ per kWh
23	2.6958 ¢ per kWh	7.4250 ¢ per kWh
6, 6A, 6B (no interval meter)	0.0000 ¢ per kWh	7.1250 ¢ per kWh
6, 6A, 6B (with interval meter)	Under Schedule 32	5.9250 ¢ per kWh
8, 9, 9A	Under Schedule 32	5.9250 ¢ per kWh

(continued)

Issued by authority of Report and Order of the Public Service Commission of Utah in Docket No. ~~15-035-6+19-035-T08~~

FILED: ~~February 25, 2016~~September 18, 2019

EFFECTIVE: ~~March 28, 2016~~January 1, 2020



P.S.C.U. No. 50

~~First~~ **Second** Revision of Sheet No. 73.1
Canceling ~~Original~~ **First Revision of** Sheet No. 73.1

ELECTRIC SERVICE SCHEDULE NO. 73 - Continued

MONTHLY BILL: The Monthly Bill shall be ~~the kWh associated with the number of~~ Subscriber ~~the volume of kWh~~ Solar Energy ~~Blocks that~~ the Customer has agreed to purchase applied against the above Charges. The Monthly Bill is in addition to all other charges contained in Customer's applicable tariff schedule, with adjustments to the charges in the Customer's applicable tariff schedule as set forth in the Special Conditions section of this schedule.

(continued)

Issued by authority of Report and Order of the Public Service Commission of Utah in Docket No. ~~15-035-~~
~~6+19-035-T08~~

FILED: ~~February 25, 2016~~ September 18,
2019

EFFECTIVE: ~~March 28, 2016~~ January 1, 2020

ELECTRIC SERVICE SCHEDULE NO. 73 - Continued

MONTHLY BILL: The Monthly Bill shall be the volume of kWh Solar Energy that the Customer has agreed to purchase applied against the above Charges. The Monthly Bill is in addition to all other charges contained in Customer's applicable tariff schedule, with adjustments to the charges in the Customer's applicable tariff schedule as set forth in the Special Conditions section of this schedule.

SPECIAL CONDITIONS:

1. After subscribing, customers will remain subscribed to the program until they cancel. Customers subscribing to amounts equal to or greater than 2,000 kW may negotiate specific subscription durations to be established as part of their electric service agreement.
2. Customers under Schedules 1, 2, 3 and 23 can subscribe up to as many blocks as they want, but their subscription cannot exceed 100% of their usage for the prior 12 months (on a kWh basis). Customers can subscribe to at least one block, regardless of usage, if they meet all other eligibility requirements.
3. Customers under Schedules 6, 6A, 6B, 8, 9 and 9A can subscribe to as many blocks as they want, but their subscription cannot exceed the lower of their usage for the prior 12 months or 2,000 kW. Customer can subscribe to at least one block, regardless of usage, if they meet all other eligibility requirements.
4. If a customer cancels a subscription, the subscribed amount will be added to the available program capacity. Cancellation shall be effective at the end of the billing period in which the request is made.
5. Customers may transfer their subscriptions to other locations in the Company's Utah service territory if they move (provided they stay on the same rate schedule and account remains under the same customer name).
6. Customers can cancel their subscription within 30 days of signing up with no penalty/cancellation fee.
7. Subscribers may pay a cancellation fee if they cancel within three years of subscribing. For the block option, the cancellation fee will equal up to \$50 per block. After subscribing for three years, no cancellation fees will apply. Subscribers that participate in the 100% solar option may pay a cancellation fee up to \$100. - Customers with subscription amounts equal to or greater than 2,000 kW must provide notice six months in advance of termination or must pay the solar block charge for up to six months.
8. The Company may not accept enrollments for accounts that have a time-payment agreement in effect, or have received two or more disconnect notices, or have been disconnected for non-payment within the last 12 months.

(continued)

Issued by authority of Report and Order of the Public Service Commission of Utah in ~~Advice No. 17-06~~ Docket No. ~~17-035-T06~~ 19-035-T08

FILED: ~~April 25, 2017~~ September 18, 2019

EFFECTIVE: ~~April 27, 2017~~ January 1, 2020

ELECTRIC SERVICE SCHEDULE NO. 73 - Continued

9. The Company will retain ownership of the Renewable Energy Credits (RECs) and all other environmental attributes including but not limited to carbon emission reduction credits, which will be retired by the Company on behalf of subscribers. Customers may request to have RECs deposited in their own Western Renewable Energy Generation Information System account at their own expense.

(continued)

Issued by authority of Report and Order of the Public Service Commission of Utah in ~~Advice No. 17-06~~ Docket No. ~~17-035-T06~~19-035-T08

FILED: ~~April 25, 2017~~September 18, 2019

EFFECTIVE: ~~April 27, 2017~~January 1, 2020

ELECTRIC SERVICE SCHEDULE NO. 73 - Continued

9. The Company will retain ownership of the Renewable Energy Credits (RECs) and all other environmental attributes including but not limited to carbon emission reduction credits, which will be retired by the Company on behalf of subscribers. Customers may request to have RECs deposited in their own Western Renewable Energy Generation Information System account at their own expense.

9.10. The Solar Block Generation Charge will be fixed for the duration of the Subscriber Contract. The Solar Block Delivery Charge will adjust over time consistent with changes in non-generation related costs (e.g., transmission, distribution, and customer service costs) approved for recovery in rates.

10.11. Customers under Schedules 6, 6A and 6B who have interval meters and customers under Schedules 8, 9 and 9A who participate in the program will be on Schedule 32 and will not be subject to a separate Solar Block Delivery Charge to the extent non-generation related delivery costs are captured in Schedule 32. Customers under Schedules 6, 6A and 6B who do not have interval meters will remain on the applicable service schedules and will not be subject to a separate Solar Block Delivery Charge to the extent non-generation related delivery costs are captured in the Facilities Charge, Demand Charge, or some other applicable charge in those Schedules.

12. BLOCK SUBSCRIPTIONS: For Schedules 1, 2, 3 and 23 and Schedules 6, 6A and 6B (no interval meter), the kWh from the Subscriber Solar Energy Block(s) will be applied to the actual electricity usage each month, resulting in a reduced amount of kWh to be billed under the customer's applicable service rate schedule. Electricity used in excess of the purchased solar energy kWh will be billed consistent with the Customer's regular electricity service rate schedule. If electricity usage is below the amount covered by the solar energy block(s), then the excess solar energy block kWh will be rolled forward and credited against the Customer's usage in the following month. The Customer will still be responsible for the full Solar Energy Block Charges each month. On the monthly billing following the anniversary date of the customer's subscriber solar contract, any excess banked solar energy block kWh will be valued at the then-current Schedule 37 avoided cost rate for the applicable time period and donated to the Low Income Program and the balance will reset to zero.

11.13. 100% USAGE SUBSCRIPTIONS: For Schedules 1, 3 and 23 where customer has subscribed to 100% Solar Option, all kWh energy charges each month will be billed consistent with the Subscriber Solar rate as published in this schedule.

12.14. For Schedules 8, 9 and 9A and Schedules 6, 6A and 6B (with interval meter), charges will be determined under Schedule No. 32. The kWh from the Subscriber Solar Energy Blocks will be netted against the customer's metered usage on a fifteen (15) minute basis. Excess solar energy block kWh in any given fifteen (15) minute period cannot be rolled to

(continued)

Issued by authority of Report and Order of the Public Service Commission of Utah in Docket No. ~~15-035-6+19-035-T08~~

FILED: ~~October 26, 2015~~ September 18, 2019

EFFECTIVE: ~~October 21, 2015~~ January 1, 2020

ELECTRIC SERVICE SCHEDULE NO. 73 - Continued

future periods. If there are more solar energy kWh than customer load in any given 15 minute period, the customer's load will be set to zero for that fifteen (15) minute period; and the amount of solar energy kWh that exceeds the load (prior to setting the load to zero) will be credited to the customer at the then-current Schedule 37 avoided cost rate for the applicable time period.

(continued)

Issued by authority of Report and Order of the Public Service Commission of Utah in Docket No. ~~15-035-6+19-035-T08~~

FILED: ~~October 26, 2015~~ September 18, 2019

EFFECTIVE: ~~October 21, 2015~~ January 1, 2020

ELECTRIC SERVICE SCHEDULE NO. 73 - Continued

14. For Schedules 8, 9 and 9A and Schedules 6, 6A and 6B (with interval meter), charges will be determined under Schedule No. 32. The kWh from the Subscriber Solar Energy Blocks will be netted against the customer's metered usage on a fifteen (15) minute basis. Excess solar energy block kWh in any given fifteen (15) minute period cannot be rolled to future periods. If there are more solar energy kWh than customer load in any given 15 minute period, the customer's load will be set to zero for that fifteen (15) minute period; and the amount of solar energy kWh that exceeds the load (prior to setting the load to zero) will be credited to the customer at the then-current Schedule 37 avoided cost rate for the applicable time period.

~~14.~~15. Except for the Energy Balancing Account ("EBA") adjustment rate schedule, as described in this paragraph, all contracted Subscriber Solar Energy ~~Block~~ kWh and associated charges in a billing month will be included in the calculation of any adjustment rate schedules contained in a Customer's applicable tariff schedule. The EBA adjustment rate schedule will apply to all contracted Subscriber Solar Energy ~~Block~~ kWh and associated charges for the twelve (12) months immediately following the date upon which the Subscriber Solar Program solar resource begins commercial operation. Thereafter, the EBA adjustment rate schedule will continue to apply only to energy billed under the customer's applicable service rate schedule that is not purchased through the Subscriber Solar Program.

~~15.~~16. Customers being served under this schedule may not participate in Net Metering or Transition Program for Customer Generators.

ELECTRIC SERVICE REGULATIONS: Service under this Schedule will be in accordance with the terms of the Electric Service Agreement between the Customer and the Company. The Electric Service Regulations of the Company on file with and approved by the Public Service Commission of the State of Utah, including future applicable amendments, will be considered as forming a part of and incorporated in said Agreement.

ROCKY MOUNTAIN POWER
ELECTRIC SERVICE SCHEDULE NO. 73

STATE OF UTAH

Subscriber Solar Program Rider - Optional

PURPOSE: This Schedule is a voluntary program for Customers to purchase electricity from solar resources.

AVAILABILITY: At any point on the Company's interconnected system.

APPLICATION: On a first-come, first-served basis to any customer receiving service under the Company's Electric Service Schedules 1, 2, 3, 6, 6A, 6B, 8, 9, 9A and 23.

SUBSCRIBER SOLAR ENERGY BLOCK OPTION: Customers can purchase 1-kW blocks of capacity (and associated energy) in the Subscriber Solar Program resource: For Schedules 1, 2, 3, 23, and Schedules 6, 6A and 6B where the customer does not have an interval meter, the block of capacity will be assigned a fixed amount of energy of 200 kWh per month. For Schedules 8, 9, 9A, and Schedules 6, 6A and 6B where the customer does have an interval meter, the energy amount for each block will be based on the actual output of the solar resource (i.e. the actual output associated with their 1-kW block).

SUBSCRIBER SOLAR ENERGY FULL COVERAGE OPTION: Customers can purchase variable blocks of capacity (and associated energy) in the Subscriber Solar Program resource: For Schedules 1, 3 and 23, the block of capacity will be assigned a variable amount of energy equal to 100% of their total usage per month, reconciled on an annual basis. The full coverage option is not available for Schedules 2, 6, 6A, 6B, 8, 9 or 9A.

SOLAR ENERGY CHARGES:

<u>Schedule</u>	<u>Solar Delivery Charge</u>	<u>Solar Generation Charge</u>
1, 2, 3	3.9783 ¢ per kWh	7.7250 ¢ per kWh
23	2.6958 ¢ per kWh	7.4250 ¢ per kWh
6, 6A, 6B (no interval meter)	0.0000 ¢ per kWh	7.1250 ¢ per kWh
6, 6A, 6B (with interval meter)	Under Schedule 32	5.9250 ¢ per kWh
8, 9, 9A	Under Schedule 32	5.9250 ¢ per kWh

(continued)

Issued by authority of Report and Order of the Public Service Commission of Utah in Docket No. 19-035-T08

FILED: September 18, 2019

EFFECTIVE: January 1, 2020

ELECTRIC SERVICE SCHEDULE NO. 73 - Continued

MONTHLY BILL: The Monthly Bill shall be the volume of kWh Solar Energy that the Customer has agreed to purchase applied against the above Charges. The Monthly Bill is in addition to all other charges contained in Customer's applicable tariff schedule, with adjustments to the charges in the Customer's applicable tariff schedule as set forth in the Special Conditions section of this schedule.

SPECIAL CONDITIONS:

1. After subscribing, customers will remain subscribed to the program until they cancel. Customers subscribing to amounts equal to or greater than 2,000 kW may negotiate specific subscription durations to be established as part of their electric service agreement.
2. Customers under Schedules 1, 2, 3 and 23 can subscribe up to 100% of their usage for the prior 12 months (on a kWh basis). Customers can subscribe to at least one block, regardless of usage, if they meet all other eligibility requirements.
3. Customers under Schedules 6, 6A, 6B, 8, 9 and 9A can subscribe to as many blocks as they want, but their subscription cannot exceed the lower of their usage for the prior 12 months or 2,000 kW. Customer can subscribe to at least one block, regardless of usage, if they meet all other eligibility requirements.
4. If a customer cancels a subscription, the subscribed amount will be added to the available program capacity. Cancellation shall be effective at the end of the billing period in which the request is made.
5. Customers may transfer their subscriptions to other locations in the Company's Utah service territory if they move (provided they stay on the same rate schedule and account remains under the same customer name).
6. Customers can cancel their subscription within 30 days of signing up with no penalty/cancellation fee.
7. Subscribers may pay a cancellation fee if they cancel within three years of subscribing. For the block option, the cancellation fee will equal up to \$50 per block. After subscribing for three years, no cancellation fees will apply. Subscribers that participate in the 100% solar option may pay a cancellation fee up to \$100. Customers with subscription amounts equal to or greater than 2,000 kW must provide notice six months in advance of termination or must pay the solar block charge for up to six months.
8. The Company may not accept enrollments for accounts that have a time-payment agreement in effect, or have received two or more disconnect notices, or have been disconnected for non-payment within the last 12 months.

(continued)

Issued by authority of Report and Order of the Public Service Commission of Utah in Docket No. 19-035-T08

ELECTRIC SERVICE SCHEDULE NO. 73 - Continued

9. The Company will retain ownership of the Renewable Energy Credits (RECs) and all other environmental attributes including but not limited to carbon emission reduction credits, which will be retired by the Company on behalf of subscribers. Customers may request to have RECs deposited in their own Western Renewable Energy Generation Information System account at their own expense.
10. The Solar Block Generation Charge will be fixed for the duration of the Subscriber Contract. The Solar Block Delivery Charge will adjust over time consistent with changes in non-generation related costs (e.g., transmission, distribution, and customer service costs) approved for recovery in rates.
11. Customers under Schedules 6, 6A and 6B who have interval meters and customers under Schedules 8, 9 and 9A who participate in the program will be on Schedule 32 and will not be subject to a separate Solar Block Delivery Charge to the extent non-generation related delivery costs are captured in Schedule 32. Customers under Schedules 6, 6A and 6B who do not have interval meters will remain on the applicable service schedules and will not be subject to a separate Solar Block Delivery Charge to the extent non-generation related delivery costs are captured in the Facilities Charge, Demand Charge, or some other applicable charge in those Schedules.
12. **BLOCK SUBSCRIPTIONS:** For Schedules 1, 2, 3 and 23 and Schedules 6, 6A and 6B (no interval meter), the kWh from the Subscriber Solar Energy Block(s) will be applied to the actual electricity usage each month, resulting in a reduced amount of kWh to be billed under the customer's applicable service rate schedule. Electricity used in excess of the purchased solar energy kWh will be billed consistent with the Customer's regular electricity service rate schedule. If electricity usage is below the amount covered by the solar energy block(s), then the excess solar energy block kWh will be rolled forward and credited against the Customer's usage in the following month. The Customer will still be responsible for the full Solar Energy Block Charges each month. On the monthly billing following the anniversary date of the customer's subscriber solar contract, any excess banked solar energy block kWh will be valued at the then-current Schedule 37 avoided cost rate for the applicable time period and donated to the Low Income Program and the balance will reset to zero.
13. **100% USAGE SUBSCRIPTIONS:** For Schedules 1, 3 and 23 where customer has subscribed to 100% Solar Option, all kWh energy charges each month will be billed consistent with the Subscriber Solar rate as published in this schedule.

(continued)

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ELECTRIC SERVICE SCHEDULE NO. 73 - Continued

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15. Except for the Energy Balancing Account ("EBA") adjustment rate schedule, as described in this paragraph, all contracted Subscriber Solar Energy kWh and associated charges in a billing month will be included in the calculation of any adjustment rate schedules contained in a Customer's applicable tariff schedule. The EBA adjustment rate schedule will apply to all contracted Subscriber Solar Energy kWh and associated charges for the twelve (12) months immediately following the date upon which the Subscriber Solar Program solar resource begins commercial operation. Thereafter, the EBA adjustment rate schedule will continue to apply only to energy billed under the customer's applicable service rate schedule that is not purchased through the Subscriber Solar Program.
16. Customers being served under this schedule may not participate in Net Metering or Transition Program for Customer Generators.

ELECTRIC SERVICE REGULATIONS: Service under this Schedule will be in accordance with the terms of the Electric Service Agreement between the Customer and the Company. The Electric Service Regulations of the Company on file with and approved by the Public Service Commission of the State of Utah, including future applicable amendments, will be considered as forming a part of and incorporated in said Agreement.

CERTIFICATE OF SERVICE

Advice No. 19-09
Docket No. 19-035-T08

I hereby certify that on September 18, 2019, a true and correct copy of the foregoing was served by electronic mail to the following:

Utah Office of Consumer Services

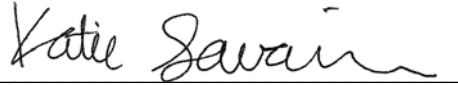
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