



October 25, 2019

VIA EMAIL

UTAH PUBLIC SERVICE COMMISSION
Heber M. Wells Building
160 East 300 South, 4th Floor
Salt Lake City, Utah 84111

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

Introduction and Background

On September 18, 2019, Rocky Mountain Power (Company) filed a proposal to amend electric service Schedule No. 73 (Subscriber Solar) to create a new "full coverage" option, to be made available to interested customers on Schedules No. 1, 3, and 23. On October 16, Utah Clean Energy, the Division of Public Utilities (Division), and the Office of Consumer Services (Office) filed comments on the Company's proposal. All parties recommended that the Public Service Commission (Commission) approve the Company's changes to electric service Schedule No. 73. The purpose of Utah Clean Energy's reply comments is to respond to recommendations made by the Office in comments filed on October 16.

Summary of Office of Consumer Services Recommendations

The Office of Consumer Services recommended that the Commission approve the Company's Application subject to the following requirements:

- 1) The cancellation fee for the Full Coverage Option should be based on a calculation of the equivalent number of blocks, or another method more equitable than the Company's proposal of up to \$100 per customer.

- 2) Customers requesting to move from the Block Option to the Full Coverage Option should be placed at the bottom of the wait list for any additional kWh requirements.
- 3) If the Company becomes aware of issues regarding over-subscription, they should promptly notify the Commission and propose modifications to alleviate the problem.
- 4) The Company should modify the tariff to ensure that descriptions of the “full coverage option,” “solar block generation charge,” “solar block delivery charge,” and “solar energy block charges” are consistent throughout.

Utah Clean Energy Response

Utah Clean Energy generally supports the recommendations made by the Office, and provides the following comments specifically related to the Office’s first and second recommendation.

First, UCE agrees that the cancellation fee for the Full Coverage Option should be proportional to the amount of energy a customer has subscribed to. The Company’s proposal of a cancellation fee equaling “up to \$100”¹ is vague and will be confusing to customers. The cancellation fee of \$50 per block was originally calculated to roughly equal six months of the Solar Block Generation Charge times 200 kilowatt-hours per share, based on the assumption that it might take the Company up to six months to re-subscribe a block if a customer canceled². UCE agrees that it is reasonable to determine the cancellation charge for Full Coverage Option customers based on a

¹ Docket No. 19-035-T08, Rocky Mountain Power Supplemental Filing, September 18 2019. Page 23, Second Revision of Sheet No. 73.2

² Docket No. 15-035-61, Rocky Mountain Power Comments Responding to Intervenors, August 27 2015. Exhibit B – Program Rider, Page 2.

12 month average of usage divided by 200 kilowatt-hours, as recommended by the Office. We suggest that this methodology is clearly spelled out in the tariff and in Company communications regarding the Full Coverage Options, so that it is clear and understandable to customers.

Second, UCE agrees that customers requesting to move from the Block Option to the Full Coverage Option should be placed on the bottom of the waitlist for any additional kilowatt-hour requirements. Based on our understanding, customers on the waitlist are currently able to obtain new shares of subscriber solar within a few weeks to a few months. UCE further recommends that customers who switch to the Full Coverage Option should not be considered “new” program customers for the purposes of determining cancelation fees. Subscriber Solar customers are not subject to cancelation fees if they cancel after three years of subscribing. The majority of new Full Coverage Option subscribers will be purchasing additional kilowatt-hours, not forfeiting kilowatt-hours, therefore they will not be imposing costs related to un-subscribed Subscriber Solar energy. For example, we suggest that a customer who has been subscribed to the Block Option for two years and switches to the Full Coverage Option for an additional year should not be charged a cancelation fee, since they will have been subscribed to the program for three years total.

Conclusion

Utah Clean Energy supports the Office’s recommendations regarding the Company’s proposed changes to electric service Schedule No. 73. We further recommend that the methodology for calculating cancelation fees for Full Coverage Options is clearly spelled out in the tariff and in Company communications, and that customers who switch from the Block Option to the Full

Coverage Option should not be charged a cancelation fee if they have been subscribed to the Subscriber Solar program (regardless of option) for more than three years. Utah Clean Energy continues to recommend that the Commission approve the Company's proposed changes to Schedule No. 73 as described in the September 18, 2019 supplemental filing.

Sincerely,



Kate Bowman
Renewable Energy Program Manager

CERTIFICATE OF SERVICE

Advice No. 19-09

Docket No. 19-035-T08

I hereby certify that on October 25, 2019, a true and correct copy of the foregoing was served by electronic mail to the following:

Utah Office of Consumer Services

Michele Beck

mbeck@utah.gov

Division of Public Utilities

Bob Davis

radavis@utah.gov

dpudatarequest@utah.gov

Rocky Mountain Power

Data Request Response Center

Michael Snow

Jana Saba

datarequest@pacificorp.com

michael.snow@pacificorp.com

jana.saba@pacificorp.com

utahdockets@pacificorp.com



Kate Bowman

Renewable Energy Program Manager