

August 16, 2019

***VIA ELECTRONIC FILING***

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

Attention: Gary Widerburg  
Commission Secretary

**RE: Docket No. 19-035-T12**

In the Matter of the Application of Rocky Mountain Power for Authority to Refund Revenues Associated with the Solar Incentive Program  
*Reply Comments*

On July 23, 2019, Rocky Mountain Power (the “Company”) filed with the Public Service Commission of Utah (the “Commission”) its Application for Authority to Refund Revenues Associated with the Solar Incentive Program, together with proposed tariff revisions to refund approximately \$3.06 million from the Utah Solar Incentive Program (“USIP”) to customers over 12 months through a reduction in the Electric Service Schedule No. 196, Sustainable Transportation and Energy Plan (“STEP”) Cost Adjustment Pilot Program. On July 23, 2019, the Commission issued a Notice of Filing and Comment Period, which provided deadlines of August 9, and August 16, 2019 for interested parties to file comments and reply comments, respectively. The Division of Public Utilities (“Division”), Office of Consumer Services (“Office”) and Utah Clean Energy (“UCE”) filed Comments. Rocky Mountain Power hereby provides its Reply Comments.

***Summary of Comments***

Rocky Mountain Power appreciates the time and effort the parties have spent evaluating the Company’s Application. The Division recommends the Commission approve the proposed refund to customers and revisions to Schedule No. 196.2. The Division also recommends that the Commission direct the Company to add information to its Annual STEP Status Report and Annual USIP Report that explains the variable program costs. The Office has no objection to the Company’s proposed allocation and method of the refund, and recommends the Commission approve the Company’s Application to refund revenues associated with the Solar Incentive Program. UCE recommends that the remaining USIP funds be transferred to the STEP program in order to fund additional projects for the benefit of customers.

***RMP Response to Comments***

The Company will provide an accounting of the USIP balance including the current variable charges in the Annual STEP Report and Annual USIP Report, as requested by the Division. With respect to the comments from UCE, Rocky Mountain Power is not authorized to allocate any funds to the STEP program beyond the \$10,000,000 annual amount (total of \$50,000,000) set forth in Utah Code § 54-7-12.8(6)(a)(i). In addition, since there are already unspent STEP program funds, which the Company will be discussing with interested parties later this year, the Company does not believe that adding additional funds to STEP at this time is in the interest of its customers.

***Conclusion***

For the reasons set forth above, the Company respectfully requests that the Commission approve its Application for Authority to Refund Revenues Associated with the Solar Incentive Program, together with the proposed tariff revisions included with the Application.

Sincerely,



Joelle Steward  
Vice President, Regulation

**CERTIFICATE OF SERVICE**

Advice No. 19-12  
Docket No. 19-035-T12

I hereby certify that on August 16, 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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**Rocky Mountain Power**

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Mary Penfield  
Regulatory Operations Adviser