

AMENDED ACTION REQUEST

Date: August 30, 2012

FROM: Public Service Commission Due: September 21, 2012
SUBJECT: RMP's Customer-Owned Generation and Net Metering Report 12-035-87
(Company Name, Case Number, etc.)

6/27/2012

12-035-87

(11) ROCKY MOUNTAIN POWER'S CUSTOMER OWNED GENERATION AND NET METERING REPORT In the Matter of Rocky Mountain Power's Customer Owned Generation and Net Metering Report and Attachment A for the Period April 1, 2011 through March 31, 2012

This is a request for the Division to:

- Review for Compliance and Make Recommendations (See Note below)
- Review Application and Make Recommendations
- Analyze the Complaint
- Review Notice and Make Recommendations
- Review Request for Agency Action and Make Recommendations
- Investigate
- Other – Explanation and Statement of Issues to be Addressed below:

Note: Rocky Mountain Power's (Company) June 27, 2012 filing in this docket was submitted in compliance with Docket 08-035-T04, "In the Matter of Rocky Mountain Power is proposing changes to its Schedule 135 to make it consistent with requirements set forth in Utah's recently passed Senate Bill 88" and UAC R746-312-16 – Electrical Interconnection Rule (Rule) – Public Utility Maps, Records, and Reports. The filing includes a cover letter, Rocky Mountain Power's Customer Generation Report for the period of April 1, 2011 to March 31, 2012 (2011 Report), and Attachment A – a list of resources interconnected with the Company (both net metered and non-net metered). The Division's August 16th memo in this docket only addresses the Division's assessment of compliance with the Commission's reporting requirements in the net metering

program. Please review this report for compliance with the net metering reporting requirements specified in Dockets 08-035-78 and 08-035-T04 and the interconnection reporting requirements contained in R746-312-16(2). Also, please address the following:

- Are the number and type of facilities included in the Customer Generation Report tables consistent with the information provided in Attachment A? If not, please provide correct numbers.
- In the Commission's November 30, 2010, Report and Order Modifying Reporting Requirements in Docket Nos. 08-035-78, 08-035-T04 and 10-035-58 (November Order), the Commission suggested, in order to address a possible mismatch in the timing of net metering and interconnection reporting required by the Rule, the Company should provide all of the data required by the rule through the end of the annualized billing period of the year the report is being submitted (i.e., data for the calendar year being reported data plus data for January, February, and March of the following year) thereby satisfying all requirements. The Company followed this suggestion in its Customer Owned Generation and Net Metering Report and Attachment A for the Period January 1, 2010 through March 31, 2011, filed in Docket No. 11-035-105. The Company, however, changed its format for the 2011 Report and it appears some information may be missing (e.g., January – March 2011 excess net metering generation per month data). Please evaluate whether the Company's 2011 Report provides all of the data required for the annual interconnection report specified in R746-312-16(2) and the Commission's November Order.