



State of Utah
Department of Commerce
Division of Public Utilities

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ACTION REQUEST RESPONSE

To: Utah Public Service Commission

From: Division of Public Utilities
Chris Parker, Director
Energy Section
Artie Powell, Manager
Charles Peterson, Technical Consultant
Carolyn Roll, Utility Analyst

Date: September 21, 2012

Re: Docket No. 12-035-87 - Rocky Mountain Power's Customer Owned Generation and Net Metering Report; Cross Reference Docket 08-035-T04; R746-312-16.

RECOMMENDATION (Acknowledge with Corrections)

The Division of Public Utilities (Division) has completed an additional review of the Rocky Mountain Power's (RMP or Company) Net Metering Report for the annualized billing period ending March 31, 2012, and finds that it needs to be revised to meet the Utah Public Service Commission's (Commission) reporting requirements. The Division found that the number and type of facilities as well as the generation capacity included in the Customer Generation Report tables is not consistent with the information provided in Attachment A Customer Generation Report. The Division recommends that the Company file a revised Customer Generation Report¹ that reconciles to the Attachment A Customer Generation Report as filed on June 28, 2012.

¹ Or, alternatively, file a corrected Attachment A Customer Generation Report, or both, as necessary.

ISSUE

On June 28, 2012, Rocky Mountain Power filed with the Commission its Net Metering Report for the annualized billing period ending March 31, 2012. The Commission issued an Action Request to the Division on July 3, 2011, requesting an “Explanation and Statement of Issues to be Addressed.” On August 16, 2012 the Division submitted its memorandum recommending that the Commission Acknowledge the report as filed by the Company. The Commission issued an Amended Action Request to the Division on August 30, 2012 for further review for compliance and recommendations. This memorandum constitutes the DPU’s response to the Amended Action Request.

DISCUSSION

In compliance with the Commission’s reporting requirements, the Company filed its Net Metering Report on June 28, 2012, for the period April 1, 2011 through March 31, 2012.

In its Order dated November 30, 2010 in Docket Nos. 10-035-58, 08-035-T04, and 08-035-78, the Commission ordered,

The reporting requirements contained in R746-312[-16] supercede and replace the Company’s net metering reporting requirements in Docket Nos. 08-035-T04 and 08-035-78 with the following exceptions and clarifications:

- a) All net metering interconnections must be noted in the annual report filed pursuant to the Rule;
- b) The information required by R746-312-16(2)(a) is the same cumulative information as provided in Attachment A of the Company’s 2010 Report with the addition of the zip code, year of installation, and notation if the interconnection is a net metered resource;
- c) The Company’s annual report filed pursuant to the Rule 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 unless otherwise approved; and

- d) The Company is required to report information on the amount of net metering installed capacity relative to its net metering cap and any [unforeseen] problems or barriers in the tariff in its annual report filed pursuant to the Rule.

The reporting requirements contained in R746-312-16, Public Utility Maps, Records and Reports, states,

- (1) Each public utility shall maintain current records of interconnection customer generating facilities showing size, location, generator type, and date of interconnection authorization.
- (2) By July 1 of each year, the public utility shall submit to the commission an annual report with the following summary information for the previous calendar year:
 - (a) the total number of generating facilities approved and their associated attributes including resource type, generating capacity, and zip code of generating facility location,
 - (b) the total rated generating capacity of generating facilities by resource type.
 - (c) for net metering interconnections, the total net excess generation kilowatt-hours received from interconnection customers by month.
 - (d) for net metering interconnections, the total amount of excess generation credits in kilowatt hours, and their associated dollar value, which have expired at the end of each annualized billing period.

The Division has reviewed the Company's report and finds that it complies with the Commission's reporting requirements for the Net Metering Program except for the summary information for the previous calendar year as required in R746-312-16. The Division realizes that the first quarter of 2011 was reported on the previous Net Metering Report that was filed with the Commission on June 24, 2011. The Division recommends that the Company add

summary tables (in addition to the current tables that show the previous 12 months ending March 31 of the current year) to the Company Generation Report that shows the Net Metering Facilities by Resource Type and Net Metering Generation Capacity by Resource Type for the previous calendar year. These tables should be included in the revised Customer Generation Report that the Division recommends that the Company file.

Assuming that the Attachment A Customer Generation Report filed on June 28, 2012 is correct the new net metering facilities and total enrolled capacity need to be adjusted. There were 405 new net metering facilities; a 47% increase over facilities as of March 31, 2011, the new facilities reported by the Company was 394. Of these new installations, 391, or 96.5% (=391/405) were solar projects, the Company reports that 377 of the projects were solar installations. The total number of net metering facilities as reported on Attachment A Customer Generation Report is 1257, the Customer Generation Report filed June 28, 2012, shows a total of 1250 facilities. As of March 31, 2012, the total enrolled capacity is approximately 5479 kW, which is about 0.6% of the program cap of 923,000 kW, the Company reported enrolled capacity of 5473 kW. The Company reports no unforeseen problems or barriers at this time.

CONCLUSION

The Division recommends that the Company file an amended Company Generation Report that reconciles to the Attachment A Company Generation Report and add previous calendar year summary tables for the Net Metering Facilities by Resource Type and Net Metering Generation Capacity by Resource Type as discussed above. Subsequent to the Company's filing of a corrected report, the Division recommends that the Commission acknowledge the report.

CC: Michele Beck, OCS
Dave Taylor, RMP
Service List