

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Investigation of the
Costs and Benefits of PacifiCorp's Net
Metering Program

DOCKET No. 14-035-114

REBUTTAL TESTIMONY OF TYLER POULSON
ON BEHALF OF
SALT LAKE CITY CORPORATION

September ⁹~~8~~, 2015

RESPECTFULLY SUBMITTED,
Salt Lake City Corporation



Brian Roberts
Senior City Attorney
Salt Lake City Corporation

1 **BACKGROUND**

2 **Q. Please state your name, business address and current position with**
3 **Salt Lake City Corporation (“City”)**

4 A. My name is Tyler Poulson. My business address is 451 S State Street,
5 Salt Lake City, Utah. I am currently a Sustainability Program Manager for
6 Salt Lake City Corporation.

7 **Q. Have you previously provided testimony in this docket?**

8 A. No. I have participated in the docket through technical conferences and
9 settlement discussions, but have not provided direct testimony thus far.

10 **QUALIFICATIONS**

11 **Q. Please briefly describe your qualifications and experience.**

12 A. I have a Bachelor of Science (BS) and a Master of Science (MS) degree,
13 both in Economics from the University of Utah. I have been working on
14 energy-related matters, including energy efficiency, conservation, and
15 renewable energy, for local governments in Utah since 2009. I am
16 currently representing Salt Lake City Corporation in this docket given the
17 City's interests in net metering options for our residents and internal
18 government operations.

19 **RESPONSES TO REBUTTAL TESTIMONY**

20 **Q. What is the purpose of your rebuttal testimony?**

21 A. The intent of my rebuttal testimony is to comment on the analytical
22 framework and process to determine an equitable basis for evaluating the
23 cost-benefit implications of Rocky Mountain Power's (“Company”) net

24 metering program. This rebuttal testimony will be in response to the direct
25 testimonies of Pamela Morgan, Tim Woolf and Ben Norris filed jointly on
26 behalf of Utah Clean Energy, The Alliance for Solar Choice ("TASC") and
27 Sierra Club (together, "Joint Parties") dated July 30, 2015.

28 **Q. What is your understanding of the process and analytical framework**
29 **set forth by the Joint Parties?**

30 A. The Joint Parties advocate for a framework consisting of two analyses, a
31 cost-impact analysis and a rate-impact analysis. These two analyses are
32 described in extensive detail in the testimony submitted by Mr. Woolf on
33 July 30, 2015. The intent of this method is to adequately evaluate the
34 costs and benefits of distributed solar on the utility system while also
35 quantifying the financial impacts of the net metering program on all
36 ratepayers. The Joint Parties further advocate that the Commission
37 should evaluate ratepayer impacts on both a short-term *and* long-term
38 perspective in order to sufficiently gauge net metering outcomes and
39 inform the best possible decisions.

40 **Q. Does this process and analytical framework meet the intent of Utah**
41 **Code Ann. § 54-15-105.1 along with the goals set forth by the Public**
42 **Service Commission for this docket?**

43 A. Yes, Utah Code 54-15-105.1 states the following regarding evaluation of
44 costs and benefits for the net metering program:

45 "The governing authority shall:

46 (1) determine, after appropriate notice and opportunity for public
47 comment, whether costs that the electrical corporation or other
48 customers will incur from a net metering program will exceed the
49 benefits of the net metering program, or whether the benefits of the
50 net metering program will exceed the costs”

51 The approach recommended by the Joint Parties, with the inclusion of
52 both the cost-impact analysis and a rate-impact analysis, holistically
53 addresses the requirements set forth in Code 54-15-105.1. The
54 evaluation of both short-term and long-term impacts also ensures a
55 comprehensive investigation of the costs and benefits in order to deliver a
56 just and reasonable outcome. The process described by the Joint Parties
57 also achieves the goals conveyed by the Commission for this docket in its
58 March 9, 2015 Notice:

59 “We intend this notice to clarify the issues we intend to address in
60 the current step of this docket, culminating in the hearings
61 scheduled for October 6-8, 2015, and the issues we intend to
62 address later. In our November 21 Notices we stated: ‘In the next
63 step, we intend to establish the appropriate analytical framework for
64 making the required determinations under Utah Code Ann. § 54-15-
65 105.1’ We additionally stated that during ‘a further phase of this
66 docket, a general rate case[,] or other appropriate proceeding’ we
67 intend to ‘examine the costs and benefits that result from applying
68 data to the approved analytical framework.’

69 After considering the comments and replies, the issues that seem
70 appropriate to consider now include the topics outlined below in our
71 proposal for the use of the remaining placeholder dates. Those
72 issues seem necessary to establishing an appropriate framework
73 we could subsequently apply to examine the net metering costs
74 and benefits and consider any future rate design proposal.”

75 The Joint Parties have recommended an analytical framework to
76 accomplish the goals stated in the March 9, 2015 Notice from the
77 Commission while also not straying into rate design elements intended for
78 future proceedings.

79 **Q. Are the next steps and approval of the analytical framework**
80 **described by the Joint Parties sufficient to address all needs**
81 **associated with this docket?**

82 **A.** Yes. The Joint Parties describe a process that has been formulated to
83 achieve all stated goals of this docket. The analytical framework also
84 meets the stated goals of Utah Code 54-15-105.1 and advances the
85 overall process towards next steps considerations, including completing
86 cost-benefit analyses using the described framework and later
87 incorporating results into rate-making processes. The City recommends
88 that the Commission move forward with approving the framework as
89 described by the Joint Parties.

90 **Q. Does this conclude your rebuttal testimony?**

91 **A.** Yes.