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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 RYAN
EVANS, UTAH SOLAR ENERGY
ASSOCIATION**

1 **Q: Please state your name and business address.**

2 A: My name is Ryan Evans. My business address is 9690 South 300 West Suite 300, Sandy,
3 4 Utah 84070.

4 **Q. By whom are you employed and in what capacity?**

5 A: I am the President of the Utah Solar Energy Association.

6 **Q. On whose behalf are you testifying in this proceeding?**

7 A: The Utah Solar Energy Association.

8 **Q. Are you the same Ryan Evans who filed direct testimony on behalf of the Utah Solar**
9 **Energy Association in this proceeding?**

10 A. Yes, I am.

11 **Q: What is the purpose of your rebuttal testimony?**

12 A: The intent of my rebuttal testimony is to address the June 8, 2017 direct testimony of
13 Melissa Whited. Ms. Whited provided testimony on behalf of Utah Clean Energy and
14 argues against changing from netting consumption and generation on a monthly basis to
15 netting on an hourly basis.

16 **Q: Do you believe that a residential customer's consumption and generation should be
17 netted on an hourly basis?**

18 A: No. I do not believe that hourly netting would provide any meaningful benefits to
19 customers or the solar industry. Hourly netting may, in fact, serve as a disincentive to
20 residential customers signing up for net metering service. In contrast, a monthly netting
21 regime provides more predictability on the economics of solar to potential and current
22 customers. This predictability is critical to the ongoing marketability of rooftop solar.

23 **Q: Please explain.**

24 A: Residential profiles are highly variable on an hourly basis.¹ As a result, it is nearly
25 impossible for potential customers and the solar industry to predict the value of a PV
26 system under an hourly netting regime. In addition, Rocky Mountain Power's
27 (Company) residential customers do not generally have access to their hourly load profile
28 and consumption history. Without a pre-installed smart meter, or other such technology
29 that can provide hourly consumption data, it would not be possible to make a truly
30 informed decision on the size of a PV system to purchase, the savings a customer might
31 expect over the course of the decades the system will be in place, and how long it will

¹ See e.g., Direct Testimony of Melissa Whited at page 19, line 300.

32 take to pay off their investment. This uncertainty regarding the economics of a solar
33 purchase will likely significantly reduce a potential customer's willingness to make a
34 sizeable investment in a PV system. Furthermore, because of the unknowns in moving to
35 an hourly netting regime, future solar customers could possibly make very poor financial
36 decisions based on the lack of available data.

37 When netting consumption and generation on a monthly basis, however, a
38 potential solar customer can make an informed decision based upon their historical
39 consumption patterns given the data available to them.

40 **Q: How would hourly netting impact the solar industry?**

41 A: The uncertainty that would exist for potential customers because of their inability to
42 predict cost savings would certainly slow the market, thus opening up the potential for
43 job losses. Solar companies cannot reasonably predict the potential savings for their
44 customers in an hourly netting regime because the data that doesn't exist, consumption
45 patterns are highly variable, and there is limited access to data from other markets where
46 hourly has been implemented. I believe that this would not serve the interests of net
47 metering customers and in turn the solar industry itself.

48 One city in Utah has switched to an hourly netting period, Provo City. In
49 recognition of the issue of uncertainty, Provo Power has been in the process of converting
50 all of their residential customers over to AMI meters (solar and non-solar). This switch
51 for all customers is critical in that future potential customers will have access to the data
52 by which their consumption and generation will be measured. This access to customer
53 consumption information will help solar companies operating in that market better
54 predict customer savings. Monthly netting enables an accurate review of the economics

55 for future solar predictability, and on the economics of solar to potential and current
56 customers. This predictability is critical to the ongoing marketability of rooftop solar.

57 **Q: Does this conclude your rebuttal testimony?**

58 **A:** Yes, it does.

Signature Page to Follow

Certification:

Pursuant to Utah Code Ann. §78B-5-705, I declare under criminal penalty of the State of Utah that the foregoing is true and correct to the best of my knowledge.

Executed on July 25, 2017

By: 

Ryan Evans

CERTIFICATE OF SERVICE
Docket No. 14-035-0114

I hereby certify that a true and correct copy of the foregoing **TESTIMONY OF RYAN EVANS** was served by email on this 26th day of July 2017, on the following:

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