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State of Utah
DEPARTMENT OF COMMERCE
Office of Consumer Services

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To: Public Service Commission of Utah

From: Office of Consumer Services
Michele Beck, Director
Cheryl Murray, Utility Analyst

Date: November 8, 2017

Subject: In the Matter of the Investigation of the Costs and Benefits of PacifiCorp's Net Metering Program - Docket No. 14-035-114. Compliance Filing

On October 24, 2017, Rocky Mountain Power (Company) filed with the Public Service Commission of Utah (Commission) tariff sheets in compliance with the Commission's September 29, 2017 Order approving the Settlement Stipulation in this docket. The Company requests an effective date of November 15, 2017. On October 27, 2017 the Commission issued a notice of filing and comment period allowing interested parties to submit comments regarding the Company's Compliance Filing on or before Wednesday, November 8, 2017.

The Office of Consumer Services (Office), Utah Clean Energy (UCE) and others have worked with the Company on the tariff language prior to the Company's filing.

Although most of our recommendations were accepted by the Company there are a few areas where the Office asserts the tariff language should be improved. There is also one missing piece of information that should be added prior to the proposed effective date of November 15, 2017.

The Office has used the Company's clean copy of the tariffs to provide our suggested modifications in red-line format. Most of the edits on those sheets are very minor, simply meant to clean-up the tariff sheets and provided for the Company's use. However, there are also language changes that the Office views as necessary and requests the Commission require those modifications prior to approval of the Compliance Filing.

OFFICE REQUESTED LANGUAGE MODIFICATIONS

Following are the tariff sheet numbers and specific changes that the Office asserts are necessary improvements to the Company's Compliance Filing.

First Revision of Sheet No. 135.1 (first page)

1. Add language specifying the expected TERM of Schedule 135 (December 31, 2035).

The Office recognizes that legislation will be required to remove net metering from law but we believe that it is important that customers on this schedule be aware of the *anticipated* end date for the net metering program.

2. Add further specificity to the definition of Annualized Billing Period.

Annualized Billing Period is a defined term. Currently Schedule 135 does not specify the definition of the Annualized Billing Period for Irrigation customers, which is different than for all other customers. The Office asserts that including the Irrigation Annualized Billing Period in the definitions section is appropriate. We also note that the new Schedule 136 includes both Annualized Billing Period descriptions. The Schedule 135 language should be modified to read:

Annualized Billing Period for all customers except Customers taking service under Electric Service Schedule 10 means the period commencing after the regularly scheduled meter reading for the month of March or in the case of new Schedule 135 service customers, the date that the customer first takes service on Schedule 135 and ending on the regularly scheduled meter reading for the month of March. The Annualized Billing Period for Schedule 10 Customers shall commence after the regularly scheduled meter reading for the month of October, or for new Schedule 10 Customers beginning service on Schedule 135, the date that the customer first takes service on Schedule 135 and ending on the regularly scheduled meter reading for the month of October.

First Revision of Sheet No. 135.5 and Original Sheet 136.6:

3. Amend the definition of Electric Service Regulations.

Currently First Revision of Sheet No. 135.5 and Original Sheet 136.6 reads as follows:

ELECTRIC SERVICE REGULATIONS: Service under this Schedule will be in accordance with the terms of the Electric Service Agreement between the Customer and the Company. The Electric Service Regulations of the Company on file with and approved by the Public Service Commission of the State of Utah, including future applicable amendments, will be considered as forming a part of and incorporated in said Agreement.

The Office recognizes that this is standard language on the Company's tariff sheets and has been in place for many years, however the Office was unable to locate on the Commission's website anything labeled "Electric Service Regulations". Thus, the Office suggests that the language should be modified to make clear what the Electric Service Agreement and Electric

Service Regulations are or links provided so ratepayers can easily locate that information on the Commission's or Company's website. The Office contends that the Commission can approve the Company's Compliance Filing Tariff Sheets with an effective date of November 15, 2017 without having changed this language but including in its order a requirement that the Company provide appropriate language changes or links in a follow up compliance filing within 30 days or another appropriate time frame.

The Office further recommends that whatever changed language is adopted here should at some point be incorporated on other tariff sheets as appropriate.

Original Sheet No. 136.3

4. Under Special Conditions, add language regarding aggregating meters.

The Company discussed the issues related to aggregation and potential language with several participants in this docket. While certain details around aggregation costs are unresolved the Office asserts that aggregation language, subject to change, should be included on the effective date of the tariff, rather than added at some later date.¹ In the Office's view, this would provide more clarity to customers evaluating taking service under Schedule 136.

The Office notes that Schedule 135 contains language related to aggregation and suggests that the language in both tariffs should be the same, which may necessitate a modification to Schedule 135.

SUMMARY OF OFFICE RECOMMENDATIONS

The Office recommends that the Commission approve the tariffs with an effective date of November 15, 2017, conditioned on the Company making the Office's suggested modifications to the tariff sheets in the following areas:

- 135.1 Add description of the expectation of future termination of net metering.
- 135.1 Provide more specific Annualized Billing Period language.
- 136.3 Add language regarding aggregation.
- Incorporate the Office's suggested, minor redline edits.

The Office further recommends that the Commission require the Company to revise the language or provide a link regarding ELECTRIC SERVICE REGULATIONS in a compliance filing to be filed within 30 days of the Commission's Order.

¹ Parties on a November 1, 2017 call agreed to continue to work on aggregated billing, assignment of costs and potential solutions.