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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

**UTAH SOLAR ENERGY
ASSOCIATION'S REQUEST TO ALTER
OR MODIFY THE EFFECTIVENESS
TARIFF SHEETS**

Introduction

Pursuant to Utah Administrative Rule R746-405-2 E.4.b. and the Notice issued by the Public Service Commission of Utah ("Commission") in this Docket October 27, 2017, the Utah Solar Energy Association ("USEA") requests that the Commission alter or modify the effectiveness of the tariff sheets Rocky Mountain Power (the "Company") filed in this Docket on October 24, 2017. USEA urges the Commission to reduce the \$200 meter fee the Company filed in their Compliance Filing on October 24, 2017 (Special Conditions section- 1b.) to \$60 or \$103.08. The meter fee the Company filed is significantly higher than the amount discussed by parties throughout the last several months of negotiations for the incremental cost of a bi-directional meter.

Background

During the discussions that led to the approved settlement in this docket, the parties discussed two new fees for new residential customers in the Transition Program. The first was a non-refundable \$60 administrative fee, to cover labor costs incurred by the Company (the “Administrative Fee”). The second fee discussed was a refundable fee to cover the incremental cost for a new bi-directional meter (the “Meter Fee”). During discussions that took place over the course of several months, the parties always discussed a fee amount of approximately \$60 for the Meter Fee. Furthermore, the discussions were always focused on the actual incremental cost of replacing the meter (cost of the new bi-directional meter minus the value of the old meter), never once did the Company refute this approximate cost nor did they provide evidence that the incremental cost would be something different.

On October 4, 2017 a draft tariff was distributed by the Company that indicated a \$200 meter fee rather than the approximately \$60 that was discussed during negotiations. The same email included an analysis to justify the significantly higher fee for a “profile meter” rather than a bi-directional meter indicated in the approved settlement. The parties were not given an opportunity to examine or verify those costs provided and it was the first time we were instructed that a profile meter, not a bi-directional meter, would be needed to handle fifteen minute netting. On a call to discuss the proposed tariff several parties objected and expressed concern over the \$200 Meter Fee and the need for a different meter than had been discussed. Yet the Company filed the tariff with the \$200 Meter Fee included – a fee that has not been reviewed or analyzed by any of the parties other than the Company.

The analysis emailed on October 4, 2017 attributed the purported need for the significantly higher meter fee to labor costs and the need for a more expensive profile meter to

accommodate fifteen minute netting. This was the first time that labor costs to install the new meters were included in the Meter Fee instead of in the \$60 Administrative Fee (a fee which will be collected for all solar systems contracted that are cancelled before installation). In that analysis, the labor to install a new profile meter was priced at \$88, which by itself is higher than the approximate \$60 Meter Fee discussed during negotiations. Additionally, this was the first time the parties learned that a bi-directional meter, as agreed to in the settlement, would not be sufficient.

USEA certainly signed onto and agreed to the filed Stipulation on August 28, 2017 because the overall package was acceptable to the solar industry. USEA, however, submitted rebuttal testimony on July 25, 2017 expressing significant concerns with fifteen minute netting or any netting period that was outside of monthly netting given the Company's inability to show customers their consumption on a sub-monthly level. Given USEA's concerns over sub-monthly netting, USEA had no expectation of what might be needed to implement such a netting period. Furthermore, with this added expense, parties have been told that the new meter will not give a customer access to their overall consumption levels, solely what is purchased from the Company. To accurately see and possibly reduce their overall consumption, a customer will now need to purchase a completely separate monitor to record consumption and production from their system.

Summary of Objections

The Utah Solar Energy Association specifically objects to the filed \$200 Meter Fee for the following reasons: (1) the parties involved in negotiations were never given an opportunity to examine and discuss this significantly higher cost for meters, (2) when discussing this refundable meter fee the parties had used "approximately \$60" as a reference point for several months of conversations and proposals, (3) labor incurred by the Company was agreed to as part of the \$60

Administrative Fee as filed in the tariff, not as a part of the Meter Fee, and (4) the parties settled on the incremental cost of a bi-directional meter not the incremental cost of a profile meter which should be determined in a more formal process.

Requested Relief

USEA urges the Commission to reject the \$200 fee the Company has proposed and reduce it to either \$60 or \$103.08, the expense indicated by the Company for the new profile meter needed minus the value of the standard meter removed from a home.

RESPECTIVELY SUBMITTED this 8th day of November 2017.

/s/ Amanda Smith
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CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of November, 2017, an electronic copy of the foregoing was submitted via email to:

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