



- 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

UCARE Comments on PacifiCorp (dba. Rocky Mountain Power) Compliance Filing pursuant to the Public Service Commission's September 29, 2017 Order Approving Settlement Stipulation

Utah Citizens Advocating Renewable Energy (UCARE) has several concerns about the metering for transition customers and, ultimately, for all DG customers after the transition.

We raised those concerns in an email sent October 9, 2017 to Ms. Joelle Steward. Our questions are listed below along with Ms. Steward's email responses sent on Nov. 1, 2017. Issues that we still want addressed through this Commission proceeding are then summarized.

The UCARE questions ["Q"] and Ms. Steward's responses ["R"] were:

1. Q: Could you provide more information on the proposed meters and on their relative cost compared to other meters with comparable performance?

R: The proposed meter is manufactured by Aclara and the meter family model is KV2C. For additional information pertaining to the meter, please refer to the manufacturer's link at <http://www.aclara.com/products-and-services/smart-meters/ansi-commercial/kv2c-and-kv2c/>. The meter cost is comparable with that of other meter manufacturers as all meters are purchased through a competitive bid process.

2. Q: Could you provide information on how they will operate, e.g. will they collect and store the usage data until the meter is "read" or they will transmit it continuously to the company?

R: The meter will collect and store the usage data which will be read once per billing cycle. The meters are not capable of transmitting the data continuously to the company.

3. Q: Can the meters be set up to measure both the flows between DG customer and the company as well as the own-production which is used by the DG customer?

R: No, these meters are at the point of delivery to the home and will only measure the flows to and from the customer, not the generation produced or consumed behind the meter. A separate meter on the production facility would be necessary in order to determine on-site consumption. A generation meter sample is currently being considered as part of the load research study.

4. Q: Presumably, the study that will be undertaken will require measuring both of these; what will the costs be to meter the selected DG customers in addition to the proposed initial metering fee?

R: This will be discussed when we convene the workshop on the load research study. The initial meter fee is just for the costs of the meter necessary for measurement and billing of all customers in the program.

5. Q: How will the 15-minute measures be made available to the DG customers with those meters, so that the educational process noted in the stipulation can provide the customers with the most useful information on their electricity consumption patterns?

R: We will be providing the aggregated net delivery to the customer and net amount received from the customer for the month. We are not providing customers with the 15 minute date(sic) as that would be more than 2,800 rows of data in a 30 day billing month.

Q: Will they be able to see how their usage relates to the system peak, the RMP peak, and their substation peak, and thus to adjust in ways to benefit the system?

R: The information will not include details about peaks as that is not readily available for billing purposes.

Following this email exchange, UCARE is left with the following concerns:

1. The stipulation agreed that transition customers would bear the incremental cost of the new time-of-use meter. PacifiCorp provided a meter price and installation cost that totaled \$200. Ms. Steward informed us about the type of meter, the Aclara KV2C, and that its cost was comparable to other meters, with the price set through a competitive bid process.

But meter specifications were not given, nor was there mention of other types of meters that could function as well at a lower cost. In addition, since this meter will be in use during a transition period of up to three years, isn't it likely that the price will change, perhaps decreasing as economies of scale in meter production are reached.

Shouldn't this be taken into account? So at a minimum, we would request that the Commission ask for much more detail on this cost to the transition customer.

2. The proposed meters are rather antiquated, capturing only flows to and from the DG customer and storing the data to be read for the monthly billing cycle, which is currently the case. All DG installations have a production meter that can give production data; thus, production and consumption can be measured behind the meter. This will be important information in the load research study that will be undertaken to determine the export credit rate. If all of this information could be captured through improved metering, the load research study would not run afoul of the sampling problem that undermined the utility of the previous load research study. This would also avoid the added future cost of retrofitting meters on customer sites chosen for the sample.

3. Next, the fifteen-minute (net) metering was a matter of some dispute in the stipulation conversations. While this has little relevance for the transition period, there is much at stake regarding future rates and revenues. In our view, advocates for the 15-minute increment preferred that to an hourly measure because it would increase the utility's revenue stream for DG installations made after the transition period.

Proponents of one-hour measures favored the longer period because of the information it would provide to customers who want to optimize their energy use: to reduce their costs and/or to adjust their consumption to benefit the electric power system. Proponents of the longer increment argued that fifteen-minute periods would not facilitate meaningful consumption adjustments by utility customers.

Ms. Steward's response seems to support the longer measuring period. And despite involving over 2,800 rows of data, it is not clear to us why customers do not have a right to access the data that they themselves have generated. More importantly, Ms. Steward's response indicates that the hourly data would be much more meaningful to customers, and thus may be considered a more appropriate measure of electrical usage.

4. Finally, and related to information provided to customers who may want to adjust energy use to respond to system needs, the provision of own-consumption data is but part of the equation. The other part is how own-consumption correlates with system demand, e.g. how it affects system and substation peak demands.

In response to our query, Ms. Steward indicated that customers will not receive peak demand-specific information. Again, this is unfortunate and could be easily remedied by simply publicizing the actual peak loads for the system and for each substation. In this way, DG and non-DG customers could make better choices for themselves and for the system as a whole.

The new load research study presents an opportunity to more rigorously establish data underpinnings for grid efficiency analysis as terms of the stipulation agreement implicitly move customers toward time-of-use metering.

UCARE thanks the Commission for its thoughtful attention to concerns raised in the foregoing comments submitted this 8th day of November, 2017.

Submitted on behalf of UCARE by:

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