

Stephen F. Mecham (Bar No. 4089)
Stephen F. Mecham Law, PLLC
10 West 100 South, Suite 323
Salt Lake City, Utah 84101
Telephone: (385) 222-1618
Email: sfmecham@gmail.com
Attorney for Vivint Solar, Inc.

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 Vivint Solar, Inc.’s Reply Comments
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In accordance with the November 8, 2017 order of the Public Service Commission of Utah (“*Commission*”) inviting reply comments to the parties’ comments to Rocky Mountain Power’s (“*RMP*”) proposed tariff sheets filed on October 24, 2017 in this Docket. Vivint Solar, Inc. (“*Vivint Solar*”) replies as follows:

Division of Public Utilities (“DPU”)

On page 3 of DPU’s comments, they conclude that RMP gave a reasonable explanation for the proposed \$200 fee associated with the new meter. Vivint Solar disagrees. It is true that the parties agreed in the Stipulation approved by the Commission on September 29, 2017 that Transition and Post-Transition customers would pay a metering fee equal to the incremental cost of a bi-directional meter. The discussion, however, centered on a fee significantly lower than the proposed \$200 fee, which RMP first proposed five days after the Commission approved the Stipulation. There has been no analysis to determine if the fee is reasonable. DPU also distinguishes between a 15-minute interval meter and a bi-directional meter, where the Stipulation refers only to the incremental costs of a bi-directional meter. Anything more than that is excessive.

As outlined in the November 8, 2017 Request to Suspend or Modify, Vivint Solar does not accept the process RMP followed to determine the incremental cost of the bi-directional meter or the \$200 fee RMP proposed. To reiterate, the new meter RMP is proposing to install gives no additional value or benefit to rooftop solar customers and cannot provide customers with their 15-minute usage data. In addition, it diminishes value in some instances because it cannot be read from the street. According to RMP, that is because of the amount of data that must be transferred. RMP's proposed \$200 fee more than triples anything the parties discussed before RMP presented it on October 4, 2018. Vivint Solar urges the Commission to modify the tariff to the lower incremental bi-directional meter fee as Vivint Solar requested.

Office of Consumer Services (“OCS”)

OCS recommends that December 31, 2035 be included as the expected end date for grandfathering of existing customers in Schedule 135. Vivint Solar supports this recommendation. It would be in the public interest for that date to be known and easily reviewable by the grandfathered customers.

OCS also recommends that language addressing aggregation of meters be included in the tariff before it becomes effective. Vivint Solar generally does not have customers for whom aggregation would be a benefit, but does not oppose this recommendation. If the same or similar language can be used in Schedule 136 as is used in Schedule 135 as OCS suggests, the issue should be easily resolved.

Utah Solar Energy Association (“USEA”)

Generally, Vivint Solar supports and agrees with USEA's comments and recommendations, except for the alternative higher meter fee they suggest for relief. Vivint Solar recommended the lower fee and continues to urge the Commission to modify RMP's proposed

\$200 fee to the lower fee before the tariff becomes effective.

Utah Clean Energy (“UCE”)

UCE addresses two issues: aggregation of meters and RMP’s plans for new meters. As with OCS, Vivint Solar does not oppose UCE’s recommendation to include language resolving the aggregation issue before the tariff becomes effective.

Vivint Solar disagrees with UCE’s conclusion that the \$200 meter fee need not be changed now. Vivint Solar’s rationale is explained in its November 8, 2017 Request to Suspend or Modify. Otherwise, Vivint Solar generally supports the remainder of UCE’s analysis. UCE provides cost evidence for meters being used elsewhere that are smarter and more capable than the meter RMP is proposing, at a cost point less than \$200. The parties and the Commission should have an opportunity to examine that data and explore other options for residential solar customers. The meter UCE found can be read from the street and can provide usage data to customers in 15-minute increments, neither of which the meter RMP is proposing to install can do. This would be a far greater benefit to customers and to RMP. The meter issues, both cost and capability, should be resolved before the tariff becomes effective.

Utah Citizens Advocating Renewable Energy (“UCARE”)

UCARE expresses the same or similar concerns over the meter issues as the other solar parties who elected to comment. Vivint Solar supports UCARE’s comments and believes they should be addressed before the tariff is approved and becomes final.

Respectfully submitted this 13th day of November, 2017.

/s/Stephen F. Mecham

CERTIFICATE OF SERVICE

I hereby certify that on November 13, 2017, I sent a true and correct copy of Vivint Solar, Inc.'s Reply Comments in Docket No. 14-035-114 by email to the following:

DIVISION OF PUBLIC UTILITIES:

Chris Parker
William Powell
Patricia Schmid
Justin Jetter

chrisparker@utah.gov
wpowell@utah.gov
pschmid@agutah.gov
jjetter@agutah.gov

OFFICE OF CONSUMER SERVICES:

Michele Beck
Cheryl Murray
Robert Moore
Steve Snarr

mbeck@utah.gov
cmurray@utah.gov
rmoore@agutah.gov
stevensnarr@agutah.gov

SALT LAKE CITY CORPORATION

Tyler Poulson

Tyler.poulson@slcgov.com

UAE

Gary A. Dodge
Phillip J. Russell

gdodge@hjdllaw.com
prussell@hjdllaw.com

SUNRUN AND EFCA

Thad Culley
Bruce Plenk

tculley@kfwlaw.com
solarlawyeraz@gmail.com

UCARE

Michael D. Rossetti
Stanley T. Holmes
Dr. Robert G. Nohaver

Mike_rossetti@ucare.us.org
Stholmes3@xmission.com
nohavec@xmission.com

UTAH SOLAR ENERGY ASSOCIATION

Amanda Smith
Ryan Evans

ASmith@hollandhart.com
revans@utsolar.org

WESTERN RESOURCE ADVOCATES

Jennifer Gardner

jennifer.gardner@westernresources.org

SIERRA CLUB

Casey Roberts
Travis Ritchie

casey.roberts@sierraclub.org
travis.ritchie@sierraclub.org

UTAH CLEAN ENERGY

Sophie Hayes
Sarah Wright

sophie@utahcleanenergy.org
sarah@utahcleanenergy.org

SUMMIT COUNTY ATTORNEY

David L. Thomas

dthomas@summitcounty.org

SALT LAKE COUNTY

Donald Hansen
Jennifer Bailey

dhansen@slco.org
jenbailey@slco.org

AURIC SOLAR

Elias Bishop

elias.bishop@auricsolar.com

HEAL Utah

Michael Shea

michael@healutah.org

ROCKY MOUNTAIN POWER

Jeff Richards
Yvonne Hogle
Matt Moscon

Robert.richards@pacificorp.com
yvonne.hogle@pacificorp.com
dmmoscon@stoel.com

VOTE SOLAR

Rick Gilliam

rick@votesolar.org

PARK CITY

Luke Cartin
Thomas Daley

Luke.Cartin@parkcity.org
tdaley@parkcity.org

INTERMOUNTAIN WIND AND SOLAR

Brian Burnett

bburnett@kmclaw.com

LEGEND SOLAR

Nathan K. Fisher

nathanf@fisherhunterlaw.com

/s/Stephen F. Mecham