

December 12, 2017

VIA ELECTRONIC FILING

Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Secretary

RE: Docket No. 14-035-114 - In the Matter of the Investigation of the Costs and Benefits of PacifiCorp's Net Metering Program
Additional Comments

On November 8, 2017, the Public Service Commission of Utah ("Commission") received comments recommending changes to the Tariff Sheets submitted as part of Rocky Mountain Power's (the "Company") October 24, 2017 Compliance Filing. In its comments, the Office of Consumer Services ("Office") recommended certain changes to the Company's Tariff Sheets. The Commission invited interested parties to submit any reply to the Office's comments on November 13, 2017. In reply comments, the Company expressed its position that the Tariff Sheet changes recommended by the Office were unnecessary. On November 14, 2017, the Commission issued an order approving the proposed Tariff Sheets and requested an additional comment period on two specific issues raised by the Office in its November 8, 2017 comments:

- (1) The Office's recommendation to "[a]dd [a] description of the expectation of future termination of net metering" and RMP's objection that such language is unnecessary; and
- (2) The Office's recommendation to more specifically define the term "Annualized Billing Period" as it is used in the Tariff Sheets.

Rocky Mountain Power hereby submits additional comments pertaining to the two items as requested by the Commission.

First proposed revision: Add language specifying the expected TERM of Schedule 135 (December 31, 2035)

The Office proposes to add this language so customers are aware of the anticipated term length of Schedule 135, which is December 31, 2035. In reply comments, the Company did not agree this language was necessary to include in the Tariff because the legislature had prerogative over the term, and the Tariff as filed by the Company referenced in the Settlement Stipulation. The Company agrees, however, that communication to customers of the expected term is important, although more effectively addressed through customer communications efforts. In particular, the Company proposes to include this as part of the communication plan included in the Settlement Stipulation in paragraphs 37 and 38. Also, the Schedule 135 December 31, 2035 term date is currently posted on the Company's website on the customer generation page.

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Second proposed revision: Add further specificity to the definition of Annualized Billing Period

In its November 13, 2017 reply comments, the Company stated that this revision is not necessary. The Company did not include the change in its Compliance Filing because it wanted to minimize changes so that only the changes consistent with the compliance nature of the filing were reflected. However, the Company is not opposed to the recommendation in principle and plans to reflect this recommended change in an upcoming housekeeping filing.

Sincerely,



Joelle R. Steward

Vice President, Regulation

CC: Service List - Docket No. 14-035-114

CERTIFICATE OF SERVICE


I hereby certify that on December 12, 2017, a true and correct copy of Rocky Mountain Power's **ADDITIONAL COMMENTS** in Docket No. 14-035-114 was served by email on the following Parties:

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