



State of Utah
Department of Commerce
Division of Public Utilities

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Action Request Response

To: Utah Public Service Commission

From: Utah Division of Public Utilities

Chris Parker, Director
Artie Powell, Energy Section Manager
Bob Davis, Utility Analyst

Date: December 19, 2017

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

RECOMMENDATION - (APPROVAL)

The Division of Public Utilities (Division) recommends the Utah Public Service Commission (Commission) approve Rocky Mountain Power's (Company) proposed tariff changes (Filing) to tariff Sheet No. 136.6, "Transition Program for Customer Generators." The Division has reviewed the Company's proposed changes to Schedule No. 136.6 and determined that the Company's filing should be approved.

ISSUE

On December 14, 2017, the Company filed its revised Sheet No. 136.6 with the Commission. The Filing consists of a cover letter, edited sheet and clean sheet for the tariff mentioned above. On the same day, the Commission issued an action request to the Division to investigate the Company's filing and make recommendations. The Company proposes an effective date of January 16, 2018. The Commission requested that the Division complete its review by December 29, 2017.

DISCUSSION

The Company proposes in its cover letter that tariff Schedule No. 136 (Transition Program for Customer Generators) be revised to add language relating to meter aggregation. The tariff sheets included in the Company's compliance filing on October 24, 2017 did not include language

relating to meter aggregation. Meter aggregation was not addressed as part of the Net Metering Stipulation. In its November 14, 2017 Order, the Commission approved the tariff sheets as filed, but stated:

On the issue of meter aggregation, we find the settlement and Settlement Order do not address it, and we decline to order RMP to change the tariff to reflect a term not contemplated in the settlement. The parties represent they are working to agree on language that will address this issue.

As represented, the Company worked with interested parties to develop the meter aggregation language proposed in the First Revision of Sheet No. 136.6. The Division participated in those discussions and supports the tariff language, which reflects the discussions.

The Division notes that the Company makes an affirmative statement in its cover letter that “the proposed tariff sheets do not constitute a violation of state law or Commission rule” per R746-405-2(D). In addition to requiring an explicit affirmation, the rule states that, “The filing of proposed tariff sheets shall of itself constitute the representation of the filing utility that it, in good faith, believes the proposed sheets or revised sheets to be consistent with applicable statutes, rules and orders.”

CONCLUSION

The Division concludes the Company’s proposed revisions to tariff Sheet No. 136.6 accurately reflect the previously mentioned discussions and recommends approval.

CC: Joelle Steward, RMP
Jana Saba, RMP
Michele Beck, OCS