



State of Utah

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Public Service Commission

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Commissioner

February 7, 2018

Ms. Jana Saba
Rocky Mountain Power
1407 West North Temple, Suite 330
Salt Lake City, UT 84116

Data Request Response Center
PacifiCorp
825 NE Multnomah St., Suite 2000
Portland, OR 97232

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

Dear Ms. Saba:

The Public Service Commission of Utah ("PSC") reviewed the December 12, 2017 comments of PacifiCorp, doing business as Rocky Mountain Power ("PacifiCorp"), and the Office of Consumer Services ("OCS") filed pursuant to the PSC's November 14, 2017 Order Approving Tariff Sheets and Allowing Additional Comment Period on Limited Issues ("November Order"). The November Order requested additional comments on the following two issues: 1) adding a description of the expectation of future termination of net metering to Schedule No. 135, Net Metering ("Schedule 135" or "Tariff") and PacifiCorp's objection that such language is unnecessary; and 2) to more specifically define the term "Annualized Billing Period" as it is used in Schedule 135.

Regarding Item 1, PacifiCorp asserts that it is not necessary to include termination language in Schedule 135 because the Legislature has prerogative over the term, and the Tariff as filed by PacifiCorp references the Net Metering Settlement Stipulation.¹ PacifiCorp agrees that communication to customers of the expected term of Schedule 135 is important, and asserts this is more effectively addressed through customer communications efforts. Specifically, PacifiCorp proposes to include the Schedule 135 term in the communication plan agreed to in the Net Metering Settlement Stipulation. In addition, the December 31, 2035 termination date for Schedule 135 is currently posted on PacifiCorp's website on the customer generation page.

¹ See *Investigation of the Costs and Benefits of PacifiCorp's Net Metering Program* (Order Approving Settlement Stipulation dated September 29, 2017), Docket No. 14-035-114.

The OCS continues to recommend Schedule 135 should include language identifying the anticipated term of the net metering program as it adds clarity to what net metering customers should expect. The Office asserts that providing ratepayers with as much information within the Tariff as can be reasonably offered will benefit all concerned. In addition, the OCS believes that some customers have been provided incorrect information and one way to help alleviate this problem is for PacifiCorp and regulators to provide as much correct, relevant information within the Tariff as possible. The OCS proposes, if necessary, that the expected term language could reference that future legislation will be necessary to enact the term agreed to in the Settlement Stipulation. The OCS asserts three other parties to Docket 14-035-114, Utah Solar Energy Association, Vivint Solar, and Vote Solar previously filed comments in support of including the December 31, 2035 term date in the Tariff.

Regarding Item 2, pertaining to “Annualized Billing Period,” PacifiCorp stated it is not opposed to the OCS recommendation and later proposed modifications to Schedule 135 in its December 21, 2017 tariff filing in Docket 17-035-T15. The PSC approved the proposed modifications to Schedule 135 on January 17, 2018.

The PSC supports the OCS request for clarity and transparency of the termination date for net metering in Schedule 135. Given that, if approved, the Utah Legislature’s currently proposed Senate Bill 141, Electric Energy Amendments, would repeal Title 54, Chapter 15, Net Metering of Electricity, on January 1, 2036, the PSC requests PacifiCorp file an updated Schedule 135 after the conclusion of the 2018 Utah Legislative Session. The filing should reflect the net metering repeal date in Senate Bill 141, if approved, or the term date identified in the Settlement Stipulation.

Sincerely,

/s/ Gary L. Widerburg
PSC Secretary
DW#299897