

September 26, 2014
VIA HAND DELIVERY

UTAH PUBLIC SERVICE COMMISSION
Heber M. Wells Building
160 East 300 South, 4th Floor
Salt Lake City, Utah 84111

Re: Docket No. 14-035-116: In the matter of the disposition of remaining unused credits associated with excess customer-generated electricity provided under Utah Code Ann. § 54-15-104(4)

Dear Public Service Commission,

Pursuant to your *Notice of Comment Period*, issued September 4, 2014 in this docket, Utah Clean Energy submits the following brief comments on the disposition of unused credits associated with excess customer-generated electricity (or excess net metering credits), as provided in Utah Code Ann. § 54-015-104(4).¹ Utah Clean Energy appreciated the opportunity to provide public comment on this issue.

Utah Clean Energy supports the Commission's intention to direct Rocky Mountain Power to allocate annually expiring net metering credits to the utility's low-income assistance program, consistent with the Legislature's direction. It is the position of Utah Clean Energy that the "avoided cost value" of donated net metering credits should be *additional* to revenue collected through Electric Service Schedule 91 (Surcharge to Fund Low Income Residential Lifeline Program). Thus, Utah Clean Energy recommends that the Commission clarify, in its determination of this issue, that the donated avoided cost value of expiring credits be additional (rather than an offset) to revenue collected under Schedule 91.

Thank you for your consideration of these comments.

Sincerely,

Kate Bowman,
Solar Project Coordinator
UTAH CLEAN ENERGY

¹ "At the end of an annualized billing period, an electrical corporation's avoided cost value of remaining unused credits described in Subsection (3)(a) shall be granted: (a) to the electrical corporation's low-income assistance programs as determined by the commission; or (b) for another use as determined by the commission." UTAH CODE ANN. § 54-015-104(4) (2014).



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 26th day of September, 2014 on the following:

ROCKY MOUNTAIN POWER:

Yvonne Hogle	yvonne.hogle@pacificorp.com
Daniel. E. Solander	daniel.solander@pacificom.com
David L. Taylor	dave.taylor@pacificorp.com

DIVISION OF PUBLIC UTILITIES:

Patricia Schmid	pschmid@utah.gov
Justin Jetter	jjetter@utah.gov
Chris Parker	chrisparker@utah.gov
William Powell	wpowell@utah.gov
Dennis Miller	dennismiller@utah.gov

OFFICE OF CONSUMER SERVICES:

Rex Olsen	rolsen@utah.gov
Michele Beck	mbeck@utah.gov
Cheryl Murray	cmurray@utah.gov

/s/ Sophie Hayes