

- BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

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In the Matter of Rocky Mountain Power’s )  
Annual Report of the Results from the 2013 ) DOCKET NO. 14-035-71  
Program Year for the Solar Photovoltaic ) ORDER  
Incentive Program Offered through Schedule )  
107 )  
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ISSUED: September 25, 2014

PROCEDURAL HISTORY

On June 5, 2014, PacifiCorp, dba Rocky Mountain Power (“PacifiCorp” or “Company”) filed its annual report (“Report”) of the 2013 program-year results for the Solar Photovoltaic (“PV”) Incentive Program (“Program”) offered through Electric Service Schedule No. 107. The Report is filed in compliance with the Public Service Commission of Utah’s (“Commission”) October 1, 2012, Report and Order in Docket No. 11-035-104 (“October Order”), authorizing PacifiCorp to implement a solar incentive program.<sup>1</sup> Specifically, Paragraph 4 of the October Order states: “The Company’s annual report of the Program shall include but not be limited to: the number of applications, the number and size of completed installations, the total installed costs of all completed installations, generation data for large systems, and the number, if any, of surrendered deposits. Interested parties shall have 30 days following the filing of the annual report to comment on its content and any associated recommendations made by the Company.” On June 10, 2014, the Commission issued an action request to the Division of Public Utilities (“Division”) and a Notice of Public Comment allowing for comments on the Report by July 7, 2014, and reply comments by August 1, 2014.

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<sup>1</sup> See *In the Matter of the Investigation into Extending and Expanding the Solar Incentive Program and Possible Development of an Ongoing Program*, Docket No. 11-035-104.

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Between June 23 and July 7, 2014, the Commission received eight public email comments. On July 7, 2014, the Office of Consumer Services (“Office”) and Utah Clean Energy (“UCE”) filed comments. On July 8, 2014, the Division filed comments. No reply comments were filed.

COMMENTS ON THE REPORT

The Division recommends the Commission acknowledge the Report with conditions. The Division requests PacifiCorp provide an explanation of omitted information and reconcile report totals in the report summary to Table 1, Table 2, and Attachment A in either its reply comments or an amended report. The Division also proposes adding information to future annual reports specifically including: cumulative and prior year(s) Program data; dates, subtotals and totals to the System Specific Information spreadsheet; and the Program’s balancing account summary entries and account balance.

The Office recommends changes to the Program and future reports. Prior to acknowledgement of the Report, the Office recommends the Commission require PacifiCorp to identify the requested information that it is not providing in the Report and the reason(s) for the omission(s). The Office recommends that no further capacity reservations should be provided in the large non-residential sector until the problems with the production meters are resolved and PacifiCorp provides an affirmative statement to that effect. The Office recommends future annual reports should: Identify any missing information and provide the reason for its omission; for clarity, apply more descriptive labels to the categories “Offered Capacity” and “Offered Capacity-Did Not Pay Deposit” in Tables 1, 2, 6 and 7; identify the disposition of surrendered

deposits; and include the amount of RECs obtained through the Program for that year and cumulatively.

UCE recommends the Commission schedule a technical conference or stakeholder meeting to discuss barriers to Program participation and to consider the following changes to the Program:

- Ways to limit residential applications to serious candidates;
- given that unused capacity was rolled over into the next year in both 2013 and 2014, how unallocated capacity would be awarded in the final year of the program;
- decrease the residential incentive amount that is awarded to each customer in order to allocate the available funds across a larger pool of applicants and/or create a second tier residential incentive program with a higher incentive that serves low income housing;
- extend the time allowed for the completion of small non-residential projects from 12 months to 18 months, as is the case with the large non-residential category;
- raise the cap on the size of a small non-residential project from 25 kW to 100 kW; and
- provide a different application process for small non-residential projects that makes it possible to screen for applicants who are more prepared to complete a solar installation.

Additionally, UCE recommends the Commission clarify the process by which RECs are credited to PacifiCorp and retained by PV system owners to ensure that the procedures are in compliance with Docket No. 11-035-104. UCE recommends the Report include a record of the quantity and source of the RECs obtained through the Program.

Eight public email comments were received. Most comments are from participants or potential participants in the Program. These comments allege short-comings of the Program and provide recommendations for Program changes. Specifically, these comments allege the application process could be simplified, program information could be more specific, additional applicants should receive an award, unused awards should be awarded to other applicants, funding should be further shifted to small residential systems, the down payment should be reviewed or removed, the incentive should be increased instead of decreased over time, additional funds should be allocated, the lottery should be eliminated, larger projects should be built and partially leased to customers, and additional information including REC accounting should be addressed in the Report.

DISCUSSION

The Division and Office recommend the Commission acknowledge the Report either with conditions, or after clarifications are provided by PacifiCorp in either its reply comments or an amended report. However, PacifiCorp did not file reply comments or an amended report.

We direct PacifiCorp to file its response to the Division's and Office's concerns with the Report as follows: 1) PacifiCorp should provide an explanation of omitted information and reconcile report totals in the report summary to Table 1, Table 2, and Attachment A; and 2) PacifiCorp should identify the requested information that it is not providing in the Report and the reason(s) for the omission(s).

We further direct PacifiCorp to respond to the recommendations that future reports include: 1) cumulative and prior year(s) Program data; dates, subtotals and totals to the

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System Specific Information spreadsheet; and the Program's balancing account summary entries and account balance; 2) identification of any missing information and rationale for its omission; 3) more descriptive labels to the categories "Offered Capacity" and "Offered Capacity-Did Not Pay Deposit" in Tables 1, 2, 6 and 7; 4) the disposition of surrendered deposits; and 5) the amount of RECs obtained through the Program for that year and cumulatively.

Finally, PacifiCorp shall explain any changes it believes need to be made to implement the Program as it is currently designed to address relevant comments filed in this docket. We will address the question of the adequacy of the Report and its acknowledgement, and any further proceedings to address issues with the Program, after receiving the clarifying information noted above.

ORDER

1. PacifiCorp shall file responsive comments addressing the issues identified in the Discussion section of this order by October 30, 2014.

DATED at Salt Lake City, Utah this 25<sup>th</sup> day of September, 2014.

/s/ Ron Allen, Chairman

/s/ David R. Clark, Commissioner

/s/ Thad LeVar, Commissioner

Attest:

/s/ Gary L. Widerburg  
Commission Secretary  
DW#260895

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CERTIFICATE OF SERVICE

I CERTIFY that on the 25<sup>th</sup> day of September, 2014, a true and correct copy of the foregoing was served upon the following as indicated below:

By Electronic-Mail:

Data Request Response Center ([datarequest@pacificorp.com](mailto:datarequest@pacificorp.com))  
PacifiCorp

Dave Taylor ([dave.taylor@pacificorp.com](mailto:dave.taylor@pacificorp.com))  
Daniel Solander ([daniel.solander@pacificorp.com](mailto:daniel.solander@pacificorp.com))  
Rocky Mountain Power

By Hand-Delivery:

Division of Public Utilities  
160 East 300 South, 4<sup>th</sup> Floor  
Salt Lake City, UT 84111

Office of Consumer Services  
160 East 300 South, 2<sup>nd</sup> Floor  
Salt Lake City, UT 84111

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Administrative Assistant