



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  
Carolyn Roll, Utility Analyst

Date: December 1, 2014

Re: Docket No. 14-035-71 - Rocky Mountain Power's Utah Solar Photovoltaic Incentive Program Modified Annual Report for Program Year 2013: Pursuant to Commission Order in Docket No. 11-035-104. Division's Review and Recommendation – Acknowledge.

### RECOMMENDATION (ACKNOWLEDGE)

The Division of Public Utilities (Division) has reviewed Rocky Mountain Power's (RMP or Company) Utah Solar Photovoltaic Incentive Program Modified Annual Report (Report) for the period ending December 31, 2013, and finds that it meets the Public Service Commission of Utah's (Commission) reporting requirements for the data that were available for reporting.

### ISSUE

On July 26, 2012, the Commission held a duly-noticed scheduling conference in Docket No. 11-035-104 to set a procedural schedule for processing an application for approval of a new Solar Incentive Program (Program). On August 10, 2012 Rocky Mountain Power filed its application of a Solar Incentive Program and proposed Electric Service Schedules 107 and 195 and requested an effective date of October 12, 2012. As outlined in the Scheduling Order in Docket No. 11-035-104 dated July 27, 2012, comments on the application were due August 29, 2012.

The Division filed comments on the application August 29, 2012. On September 12, 2012 the Commission held a hearing on the Application. The Commission issued its Report and Order in Docket No. 11-035-104 approving the Solar Incentive Program with an effective date of October 12, 2012. One of the requirements in the order was that the Company file an annual report of the Program. The Company filed with the Commission its Utah Solar Photovoltaic Incentive Program Annual Report for the 2013 program year on June 5, 2014. On June 10, 2014 the Commission issued an Action Request to the Division to review the Report and make recommendations. On July 8, 2014 the Division submitted comments to the Commission requesting that the Company provide an explanation of omitted information and reconcile report totals in the report summary to Table 1, Table 2, and Attachment A. The Commission issued an Order on September 25, 2014 directing the Company to file responsive comments addressing the issues identified in the Discussion section of the order. The Company filed comments and a modified Report on October 30, 2014. On November 7, 2014 the Commission issued an Action Request to the Division to review the filing for compliance with the Commission's order. This memorandum is the Division's response to that request.

## **DISCUSSION**

In its Order dated September 25, 2014 in Docket No. 14-035-71 the Commission ordered,

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

The Report Executive Summary clarifies that “complete information for all projects accepted in the 2013 program year is not available at the time this report is drafted as the time allotted to complete the projects has not elapsed.”<sup>1</sup> The Company will provide cumulative data and data from each program year in the annual report as the program progresses.

In the modified Report the discrepancies in Table 1, Table 2, and Attachment A have been corrected. The more descriptive labels have been added to the Report Tables. Table 8, which shows the entries to the program balancing account, has been included in the report.

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<sup>1</sup> Utah Solar Incentive Program 2014 Annual Report, page 1.

The Company will be using the surrendered deposits as an offset to the administrative costs of the program. At the time that it is determined that all projects from a program year are either not being installed or are complete the Company will transfer all surrendered deposits for the program year as a credit to the deferred account.

Beginning in the 2015 annual report, the Company will provide the total renewable energy certificates (“RECs”) obtained from projects affiliated with the program. Annual and cumulative totals will be provided. For ease of calculation the Company will begin collecting RECs the first full month after the incentive has been paid to the participant. The calculation will be based on an assumption of 0.023 RECs per month per incentivized kW<sub>CSI-AC</sub>. Columns have been added into the modified Attachment A with the incentive payment date, the assumed monthly REC total, and the total RECS assumed through December 2014.

## **CONCLUSION**

The Division recommends that the Commission acknowledge the Company’s Utah Solar Photovoltaic Incentive Program Annual Report that was filed on October 30, 2014.

The Company will include additional information in future annual reports. These items include prior year(s) as well as cumulative program data; dates, subtotals and totals to System Specific Information spreadsheet; the Program’s balancing account summary entries and account balance; disposition of surrendered deposits; and the amount of RECs obtained through the Program for that year and cumulatively.

CC Jeffrey K. Larsen, RMP  
Dave Taylor, RMP  
Michele Beck, OCS  
Service List