

- BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

In the Matter of Rocky Mountain Power's Customer Owned Generation and Net Metering Report and Attachment A for the Period April 1, 2014 through March 31, 2015	<u>DOCKET NO. 15-035-64</u> <u>ORDER</u>
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ISSUED: September 24, 2015

SYNOPSIS

The Commission acknowledges PacifiCorp's Customer-Owned Generation and Net Metering Report and directs PacifiCorp to provide additional information in future reports.

This matter is before the Public Service Commission of Utah ("Commission") regarding the Customer Owned Generation and Net Metering Report and Attachment A for the Period April 1, 2014 through March 31, 2015 ("2015 Report"), filed by PacifiCorp, dba Rocky Mountain Power ("PacifiCorp"), on July 1, 2015. In response to the Commission's August 6, 2015 Notice of Filing and Comment Period, on September 4, 2015, the Division of Public Utilities ("Division") and the Office of Consumer Services ("Office") filed comments addressing the 2015 Report. No reply comments were filed in this docket.

The Division provides a summary of the 2015 Report including the amount of enrolled net metering capacity at the end of the reporting period (32,994 kilowatts) and the value of the expired net excess generation credits including the underlying price and quantity of kilowatt hours expired used to determine the value (\$34,953, \$0.0346, and 1,010,210 kilowatt-hours, respectively). The Division observes PacifiCorp's current enrolled net metering capacity of 32,994 kilowatts is 3.57 percent of the program cap of 923,000 kilowatts and states PacifiCorp

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reports no unforeseen problems or barriers in its tariff at this time. The Division agrees with the Office's recommendation presented below that future reports should include the calculation of the price used to determine the value of the expired net excess generation credits for the reporting period.

The Division also presents the relevant reporting requirements applicable to the 2015 Report.^{1,2} The Division concludes there are no outstanding issues at this time and recommends the Commission acknowledge the 2015 Report as complying with the Commission's reporting requirements.

The Office indicates the 2015 Report provides the information required by the Commission's reporting requirements. The Office, however, identified several items in Appendix A of the 2015 Report requiring clarification from PacifiCorp. These items include inconsistencies in customer data, the use of the term "other" in the "Resource Type" column, missing zip codes for several generating facilities, and a discrepancy in the information presented in Table 1 and Attachment A of the 2015 Report. All of these items were addressed by PacifiCorp in data request responses, one of which included a revised Attachment A. The Office also observes that the determination of the value of expired credits is more complicated than simply using the current avoided cost value. Finally, the Office expresses its concern with the growing number of net metering customers with excess generation.

¹ See *In the Matter of the Filing of Rocky Mountain Power's Net Metering Report for the period April 1, 2009 to March 31, 2010*, Docket No. 10-035-58; *In the Matter of the Consideration of Changes to Rocky Mountain Power's Schedule No. 135 - Net Metering Service*, Docket No. 08-035-78; and *In the Matter of the Approval of Rocky Mountain Power's Tariff P.S.C.U. No. 47, Re: Schedule 135 - Net Metering Service*, Docket No. 08-035-T04 (Report and Order Modifying Reporting Requirements, November 30, 2010).

² See *Utah Administrative Code Section R746-312-16, Electrical Interconnection, Public Utility Maps, Records and Reports*.

The Office concludes the 2015 Report satisfies the Commission's reporting requirements and recommends the Commission acknowledge the 2015 Report. To address the issues identified in its comments, the Office recommends the Commission require PacifiCorp to include in future annual reports additional information as mentioned above. The Office also recommends future annual reports include an explanation of how the price for expired credits listed in Appendix A, column entitled "Energy Value," is determined. Finally, the Office encourages PacifiCorp to explore ways to increase customer education on the appropriate sizing of solar installations.

DISCUSSION AND CONCLUSIONS

Based on our review of the 2015 Report and the Division's and the Office's comments, we acknowledge the 2015 Report complies with the Commission's reporting requirements. Due to the importance of this report, and in recognition that it is the sole source of detailed information on customer-owned generation regularly filed with the Commission, we direct PacifiCorp to file the updated Appendix A provided to the Office to ensure a complete and correct record in this docket.

We find merit in the Office's recommendation that future customer-owned generation and net metering reports should include a description of how the "Energy Value" price used to calculate the value of expired excess generation credits is determined. Therefore we direct PacifiCorp to provide this information in future annual reports. We also find the Office's suggestion to include explanatory, clarifying information in future reports is reasonable and recommend PacifiCorp address the Office's observations in future customer-owned generation and net metering reports.

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We commend PacifiCorp for its diligence in filing its customer-owned generation and net metering reports since 2010. These reports have provided valuable information relevant to the Commission's duties identified in Utah Code Ann. Title 54 and in support of Utah Administrative Code Section R746-312. Based on the Division's September 4th comments in this docket, we have identified one reporting enhancement that will enable parties to derive yet additional benefit from future customer-owned generation and net metering reports. The Division, referring to the increase in net metering solar capacity, states: "The majority of the variance is due to residential roof top solar projects."³ We observe the information supporting this statement is not available in the 2015 Report and can only be obtained by parties through a data request. We find the addition of a column in Attachment A identifying the electric service schedule under which each net-metered customer is taking service will be useful. Alternatively, if this information is not easily provided, we request the addition of a column indicating the revenue class for each customer (*i.e.*, residential or non-residential), similar to the data provided by PacifiCorp to the Office in response to OCS Data Request 30.1 in Docket No. 13-035-184.⁴ This new information will not only enhance our knowledge of PacifiCorp's net metering and interconnection programs but will also provide an important link between the net metering information presented in PacifiCorp's annual customer-owned generation and net metering report and in FERC Form 1 report.

³ September 4, 2015, Division Memorandum, p. 3.

⁴ See *In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations*, Docket No. 13-035-184, Direct Cost of Service Rate Design Testimony of Daniel E. Gimble for OCS and associated Exhibit C – RMP Response, Attach OCS 30.1 (May 22, 2014).

ORDER

1. We acknowledge PacifiCorp's Net Metering Report and Attachment A for the Period April 1, 2014 through March 31, 2015, complies with our reporting requirements.
2. PacifiCorp shall file an updated 2015 Report Appendix A by October 16, 2015.
3. Future customer-owned generation and net metering reports shall provide an explanation of the calculation of the price attributed to expired net excess generation credits and a column indicating the rate schedule under which each customer is taking service, or alternatively, the revenue class of each customer.

DATED at Salt Lake City, Utah, this 24th day of September, 2015.

/s/ Thad LeVar, Chair

/s/ David R. Clark, Commissioner

/s/ Jordan A. White, Commissioner

Attest:

/s/ Gary L. Widerburg
Commission Secretary

DW#269486

Notice of Opportunity for Agency Review or Rehearing

Pursuant to §§ 63G-4-301 and 54-7-15 of the Utah Code, an aggrieved party may request agency review or rehearing of this written Order by filing a written request with the Commission within 30 days after the issuance of this Order. Responses to a request for agency review or rehearing must be filed within 15 days of the filing of the request for review or rehearing. If the Commission does not grant a request for review or rehearing within 20 days after the filing of the request, it is deemed denied. Judicial review of the Commission's final agency action may be obtained by filing a petition for review with the Utah Supreme Court within 30 days after final agency action. Any petition for review must comply with the requirements of §§ 63G-4-401 and 63G-4-403 of the Utah Code and Utah Rules of Appellate Procedure.

CERTIFICATE OF SERVICE

I CERTIFY that on the 24th day of September, 2015, a true and correct copy of the foregoing was served upon the following as indicated below:

By Electronic-Mail:

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