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State of Utah
DEPARTMENT OF COMMERCE
Office of Consumer Services

MICHELE BECK
Director

To: Utah Public Service Commission

From: Office of Consumer Services
Michele Beck, Director
Cheryl Murray, Utility Analyst

Date: July 29, 2016

Re: In the Matter of Rocky Mountain Power's Customer Owned Generation and Net Metering Report and Attachment A for the Period April 1, 2015 through March 31, 2016. Docket No. 16-035-28.

Background

On June 29, 2016 Rocky Mountain Power (Company) filed its Customer Owned Generation and Net Metering Report (Report) and Attachment A for the period April 1, 2015, through March 31, 2016. The Company states the Report is submitted in compliance with Docket 08-035-T04 and R746-312-16. On July 7, 2016 the Public Service Commission (Commission) issued a Notice of Filing and Comment Period Establishing Friday, July 29, 2016 and Friday, August 12, 2016 as the deadlines for interested parties to submit comments and reply comments, respectively. The Office of Consumer Services (Office) submits the following comments in accordance with the Commission's established schedule.

Discussion

In Docket No. 15-035-64 the Commission expressed its view of the importance of the Customer Generation and Net Metering Report saying in part:

"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."¹

¹ Order in Docket 15-035-64, page 4.

Reporting Requirements

The provisions of R746-312-16 require:

- (1) Each public utility shall maintain current records of interconnection customer generating facilities showing size, location, generator type, and date of interconnection authorization.
- (2) By July 1 of each year, the public utility shall submit to the commission an annual report with the following summary information for the previous calendar year:
 - (a) the total number of generating facilities approved and their associated attributes including resource type, generating capacity, and zip code of generating facility location;
 - (b) the total rated generating capacity of generating facilities by resource type;
 - (c) for net metering interconnections, the total net excess generation kilowatt-hours received from interconnection customers by month; and
 - (d) for net metering interconnections, the total amount of excess generation credits in kilowatt hours, and their associated dollar value, which have expired at the end of each annualized billing period.

In addition to the items included in R746-312-16, the Commission's November 30, 2010 Order in Docket 10-035-58² requires that:

- 1) all net metering interconnections must be noted in the annual report;
- 2) the information required by R746-312-16(2)(a) is the same cumulative information as provided in Attachment A of the Company's 2010 Report with the addition of the zip code, year of installation, and notation if the interconnection is a net metered resource;
- 3) the Company's annual report filed pursuant to the Rule should provide all of the data required by the Rule through the end of the annualized billing period of the year the report is being submitted unless otherwise approved; and
- 4) the Company is required to report information on the amount of net metering installed capacity relative to its net metering cap and any unforeseen problems or barriers in the tariff in its annual report filed pursuant to the Rule.

Additional requirements were placed on the Company in Docket No. 15-035-64 wherein the Commission ordered that "future 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."³

General Comments

The Office has previously noted that the Company's annual reports on customer owned generation and net metering do not provide any summary or explanatory comments.

² The November 30, 2010 Order was captioned as Docket 10-035-58, Docket No. 08-035-T04 and Docket No. 08-035-78.

³ Order in Docket No. 15-035-64, page 5.

Rather, the Company relies on various tables, graphs and spreadsheets to provide the information required by Rule and Commission orders. The accompanying cover letter indicates that the Report is submitted in compliance with Docket Nos. 08-035-T04 and 08-035-78 and R746-312-16. It fails to make any reference to Docket No. 15-035-64 which places additional reporting requirements on the Company.

Completeness of Report

Although the Office was able to locate information provided in the Report for most of the requirements specified above, the Company did not include the information ordered in Docket 15-035-64. There is no explanation of the calculation of the price attributed to expired net excess generation credits and Attachment A does not include a column indicating the rate schedule under which each customer is taking service. Therefore, the Office concludes that the Report does not meet the requirements of the Commission orders.

Responses to Data Requests

In response to DPU data request 1.2 the Company provided an excel spreadsheet with formulas that allow the user to ascertain how the price attributed to expired net excess generation credits was determined by the Company, although no explanation is provided.

In that same response the Company provided a "Modified Attachment A" to which an additional column has been inserted, titled "customer rate schedule". This column provides the rate schedule under which each customer is taking service.

The Company's responses to DPU data request 1.2 provide the information required by the Commission's order in Docket No. 16-035-64. The Office asserts that this information should have been provided with the original filing as per the Commission's order.

Report Error

Attachment A to the Report includes information related to each net metering customer. Customers are not identified by name but by a customer number. Previously the Company explained that the customer number does not remain with a specific customer through the life of the account. In the Company's preparation of the annual report active accounts are sorted and ordered by their interconnection date and assigned a number for that year which may be different than the prior years' number.

In reviewing Attachment A the Office noted that Customer number 4861 has an interconnection date of July 15, 2016 yet shows excess kWh credits of 13 kWh in 2013 and 441 kWh in 2014. In OCS Data Request 2.3 the Office asked the Company to explain how excess credits were achieved prior to the interconnection date.

The Company responded as follows:

The information included in the report is in error. The facility was interconnected on October 22, 2013. On July 15, 2016 the customer changed their rate from a standard residential rate to the time of day rate. During that account transition between rate schedules the

interconnection date was modified. The Company will file a modified Appendix to the report reflecting the correct interconnection date.

Additional Comments

The Commission has previously indicated recognition of the importance of this report and that it is the sole source of detailed information on customer-owned generation regularly filed with the Commission. The Office also finds the report to be a source of useful information regarding the increasingly important issue of net metering.

The Office appreciates the Company's efforts in compiling the required information but suggests that the Company should determine a way to fully comply with all Commission requirements in each filing. When parties have to search the report for the Commission required information and then issue data requests to receive that information more work is required from all involved.

Recommendations

The Office recommends that the Commission not acknowledge Rocky Mountain Power's Customer Owned Generation and Net Metering Report and Attachment A for the Period April 1, 2015 through March 31, 2016 as it does not fully comply with Commission orders. The Report does not include an explanation of the valuation of excess credits and Attachment A does not include a column identifying the net metered customers' rate schedule. The Office further recommends that the Commission require the Company to refile the Report to comply with all Commission requirements.

Copies to:

Rocky Mountain Power
Jeffery K. Larsen, Vice President, Regulation
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Chris Parker, Director