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Governor

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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: August 12, 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.

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.

On July 29, 2016 the Office of Consumer Services (Office) submitted initial comments recommending that the Commission not acknowledge the Company's Report as it did not meet all requirements of the Commission's orders. Our comments specified that requirements ordered in Docket No. 15-035-64 were not met.

On that same date the Division of Public Utilities (Division) submitted comments stating:

"The Division of Public Utilities (Division) has reviewed Rocky Mountain Power's (Company) Net Metering Report for the annualized billing period ending March 31, 2016, and finds that it meets the Public Service Commission's (Commission) reporting requirements. The Division finds no outstanding issues at this time and recommends that the Commission acknowledge the Company's report."

The Division further concluded:

"The Division believes the Company's Net Metering Report meets the Commission's reporting requirements including the additional reporting requirements established by the Commission for Docket No. 15-035-04.

Therefore, the Division recommends the Commission acknowledge the Company's Net Metering Report."

In light of the Division's recommendations the Office has re-evaluated the Company's filing and asserts that our original assessment is accurate; the filing does not fully comply with the Commission's orders.

The Office discussed this discrepancy with the Division. It is our understanding that they agree that some of the report requirements were provided in response to data requests and are not on the record with the Commission. We further note that the Division did not provide the missing report information in its memo. The Office asserts that it is important for the report to be refiled with all of required information; responses to data requests should not be seen as sufficient to comply with the Commission's requirements. We therefore maintain our original recommendations that the Report not be acknowledged.

Correction to Office Initial Comments

Our initial comments regarding Company responses to Division data requests included the following statement:

"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."

The above reference should have been to Docket No. 15-035-64.

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
Division of Public Utilities
Chris Parker, Director