



State of Utah
Department of Commerce
Division of Public Utilities

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ACTION REQUEST RESPONSE

To: Public Service Commission of Utah

From: Division of Public Utilities
Chris Parker, Director
Energy Section
Artie Powell, Manager
Bob Davis, Utility Analyst

Date: October 7, 2016

Re: Docket No. 16-035-28 –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.

RECOMMENDATION (ACKNOWLEDGE)

The Division of Public Utilities (Division) has reviewed Rocky Mountain Power’s Net Metering Report revised Attachment A for the annualized billing period ending March 31, 2016, and finds that Attachment A has been corrected to address the Public Service Commission’s (Commission) concerns as outlined in its action request. The Division finds no outstanding issues at this time and recommends that the Commission acknowledge the Company’s report and revised Attachment A.

ISSUE

On June 29, 2016, Rocky Mountain Power (Company) filed with the Commission its 2016 Net Metering Report for Utah. On June 30, 2016, the Commission issued an Action Request to the Division requesting an investigation and a statement regarding the Company’s compliance with

additional reporting requirements stemming from the Commission's order on September 24, 2015 in Docket No. 15-035-64. The Commission asked the Division to report back by July 29, 2016. On August 12, 2016, the Office of Consumer Services (OCS) and the Company filed reply comments. On August 24, 2016, the Commission issued another action request to the Division for further review of the Company's filing based on the reply comments filed by the OCS and the Company. The Commission asked the Division to report back by October 7, 2016.

DISCUSSION

The Commission's September 24, 2015 Order for Docket No. 15-035-64, approved the OCS suggestions and ordered that future customer-owned generation and net metering reports shall provide:

- (1) An explanation of the calculation of the price attributed to expired net excess generation credits.
- (2) A column indicating the rate schedule under which each customer is taking service, or alternatively, the revenue class of each customer.¹

The Division agreed with the request from the OCS in the last net metering report docket² to include these additional requirements in future report filings. The Company's original filing on June 29, 2016 did not include these two additional requirements. The Division issued data request 1.2 to which the Company responded by providing an explanation for the current \$.0303 calculation in data request response 1.2-1. The Company submitted a modified Attachment A to include a column indicating the rate schedule of service for each customer in data request response 1.2-2.

On July 29, 2016, the OCS submitted initial comments recommending that the Commission not acknowledge the Company's Report as the Report did not meet all requirements of the Commission's orders. On August 12, 2016, the OCS filed reply comments stating that the Division should have included the Company's responses to the Division's data request 1.2-1 and 1.2-2 in its approval recommendation on July 29, 2016. On August 12, 2016, the Company refiled its Report and modified Attachment A including the additional requirements.

¹ See Docket No. 15-035-64, Commission's Order, September 24, 2015, at p. 5.

² Id. at p. 2.

On August 24, 2016, the Commission issued a second action request to the Division to review the accuracy of the Company’s reported information. In its action request, the Commission seeks (1) a more definitive explanation of the 9 rate schedules used to define each customer’s electric service schedule; (2) why there are non-Net Metering customers with assigned net metering rate schedules while some non-Net Metering customers have no rate schedule assigned; and (3) a clarification why there are 250 reported residential customers each generating over 25 kW which is a violation of Utah Code Annotated 54-15-102(3).

The Division requested information (DPU DR 3.1-3.7) from the Company to clarify the above concerns of the Commission. The Company responded with the following information. First, the company revised the definitions of rate class Schedules 08RNM06135 and 08RNM23135 as follows:

Table 1. Rate Schedule Definitions (**Revised**)

Rate Schedule	Definition
BLANK	Non - Net Metering Customer
08NETMT135	Residential Net Metering Customer, i.e., ESS 1, 2, and 3
08NMT06135	Large Non-Residential Net Metering Customer, i.e., ESS Schedule 6
08NMT6A135	Large Non-Residential Net Metering Customer, i.e., ESS 6A
08RNM06135	Large Residential Use Net Metering Customer, i.e., ESS 6
08NMT08135	Large Non-Residential Net Metering Customer, i.e., ESS Schedule 8
08GNSV008M	Large Non-Residential Net Metering Customer, i.e., ESS Schedule 8
08NMT10135	Large Non-Residential Net Metering Customer, i.e., Schedule 10
08NMT23135	Small Non-Residential Net Metering Customer, i.e., ESS 23
08RNM23135	Small Residential Use Net Metering Customer, i.e., ESS 23

Rate schedules 08RNM06135 and 08RNM23135 have the large and small residential distinction to ensure the Company bills the sales tax correctly. An example of consumption under these schedules is the common areas of large apartment complexes.

The Company’s response to the Commission’s second concern in the difference between rate schedules (08NMT08135 and 08GNSV008M) is that they are essentially the same. Schedule 08NMT08135 includes the net metering component. One customer has been placed on Schedule 08GNSV008M due to their unique billing situation. The customer has a totaling meter setup. This totaling setup takes meter reads from multiple meters which are then combined to send the customer one bill for the total consumption at the site. The customer is manually billed and to ensure the accuracy of the billing, the customer has to remain on their original rate schedule.

The Company's response to the Commission's third concern in the difference between rate schedules (08NMT06135 and 08RNM06135) is that they are identical except Schedule 08RNM06135 has the residential use distinction which ensures sales tax is billed correctly.

The Company's response to the Commission's fourth concern in the difference between rate schedules (08NMT23135 and 08RNM023135) is that they are identical except Schedule 08RNM23135 has the residential use distinction which ensures sales tax is billed correctly.

The Company's response to the Commission's fifth concern regarding non-net metering customers falling under net metering schedules is due to the Company adding the rate class column to the original Exhibit A. When the rate schedules were incorporated into the original Attachment A creating the modified Attachment A, the sequencing was off causing multiple errors. One of the errors showed non-net metering customers with net metering rate schedules. This error has been corrected in the revised Attachment A.

The Commission's sixth concern is possible violation of Utah Code Annotated 54-15-102(3) and PacifiCorp's Schedule No. 135, Net Metering Service. Schedule No. 135 and 54-15-102(3) limits eligible net metering customer generation systems to no more than 25 kilowatts for a residential facility or no more than 2 megawatts for a non-residential facility. The modified Attachment A, Schedule 08NETMT135 is assigned to over 7,500 customers whose system sizes identified in the KW column range from 0 to 1,635 KW. Of these 7,500 customers approximately 250 have a KW rating of greater than 25 kW. In response to this concern, the Company discovered that when it added the rate schedule column to the original Attachment A, the sequencing was off creating multiple errors. Another error showed incorrect rate schedules for multiple interconnections. This error has been corrected in revised Attachment A.

Finally in DPU DR 3.7, the Division inquired that if the Commission's concerns should lead to additional revisions to Attachment A, would those revisions necessitate a modification and resubmittal of the Customer Owned Generation and Net Metering Report. The Company's response is that the revisions to Attachment A have no impacts to the body of the report and therefore warrants no resubmittal.

CONCLUSION

The Division has reviewed the Company's responses to data requests (DPU DR 3.1-3.7) and revised Attachment A. The Division finds that Attachment A has been corrected to address the Commission's concerns as outlined in its action request. The Company has refiled its revised Attachment A to the Commission. The Division finds no outstanding issues at this time and recommends that the Commission acknowledge the Company's Report and revised Attachment A.

The Company's Customer Owned Generation and Net Metering Report and revised Attachment A for the Period April 1, 2015 through March 31, 2016 meets the Commission's reporting requirements, including the additional reporting requirements established by the Commission for Docket No. 15-035-64. Therefore, the Division recommends the Commission acknowledge the Company's Net Metering Report containing the revised Attachment A.

CC Jeffrey K. Larsen, RMP
Bob Lively, RMP
Michele Beck, OCS