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State of Utah
DEPARTMENT OF COMMERCE
Office of Consumer Services

MICHELE BECK
Director

To: The Public Service Commission of Utah

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

Date: May 4, 2017

Subject: Office of Consumer Services Response to Rocky Mountain Power's Application for Minor Modifications to Standardized Interconnection and Net Metering Service Agreements. Docket No. 17-035-20 and Docket No. 10-035-44.

Background

On April 4, 2017, Rocky Mountain Power (Company) filed with the Utah Public Service Commission (Commission) its Application for Minor Modifications to Standardized Interconnection and Net Metering Service Agreements (Application).

On April 7, 2017, the Commission issued a notice of filing and comment period establishing May 4, 2017 and May 19, 2017 as the dates by which any party may submit comments and reply comments, respectively.

Through this Application the Company proposes to make minor modifications to the forms used for standardized interconnection and net metering agreements. The Company does not seek approval to change any policy associated with standardized interconnection and net metering service agreements. The Company further states that these modifications have no implications on issues being considered in the net metering case, Docket No. 14-035-114.

Discussion

Prior to filing the Application with the Commission the Company instituted a call with the Office of Consumer Services (Office) and Division of Public Utilities (Division) to discuss the proposed changes as well as reasons for the changes.

The Company explains that it is updating the software used to process the applications on its website, which is requiring minor modifications to the form. In its Application the Company identifies the changes as:

- Modifying the day/date/year formatting;
- Removing reference to the Company's fax number for applications; and
- Changing the format of text lines and check boxes in the Appendix of each Agreement.

Exhibit A of the Company's Application includes redlines of the proposed changes for Level 1, Level 2, and Level 3 Net Metering Service Agreements.

The Company expresses its belief that the "proposed changes are in the public interest because they do not change the substance of the previously approved forms, and will reduce Company costs in the processing of the Agreements, which is in the interest of all of the Company's customers".

Based on discussions with the Company and our review of the Application, the Office agrees with the Company's assertion that these are minor modifications and there will be no changes to requirements for participation or policy changes implemented if the Commission approves the Application.

Recommendation

The Office recommends that the Commission approved the Company's Application as filed.

CC: Chris Parker, Division of Public Utilities
Bob Lively, Rocky Mountain Power
Daniel Solander, Rocky Mountain Power