

November 14, 2017

VIA ELECTRONIC FILING

Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Secretary

RE: Docket No. 17-035-31 – In the Matter of Rocky Mountain Power’s Customer Owned Generation and Net Metering Report and Attachment A for the Period April 1, 2016 through March 31, 2017—Reply Comments

On October 2, 2017, the Public Service Commission of Utah (“Commission”) issued a Notice of Filing and Comment Period establishing Monday, October 30, 2017, and Tuesday, November 14, 2017, as the deadlines for interested parties to submit comments and reply comments, respectively. On October 27, 2017, and October 30, 2017, the Division of Public Utilities (“Division”) and Office of Consumer Services (“Office”), respectively, filed comments on the reporting requirements of Rocky Mountain Power (“Company”). The Company addresses their recommendations in these reply comments.

The Division recommended that the Company refile the Interconnection Report with the correct reporting period and revised Section 3. The Company agrees to supplement the previously filed report with the corrections request by the Division.

The Office recommended future Customer Owned Generation and Net Metering Reports be modified to include: 1) a table indicating which customer classes (or Rate Schedules) are represented by the “Customer Rate Schedule” codes on Attachment A; 2) an explanation as to why, as a general matter, some customers may have a kWh credit in a year prior to the customer’s interconnection date; 3) a statement that the required net metering excess energy valuation is found on Attachment B or elsewhere if the Company changes the reporting configuration. The Company appreciates the Office’s comments and has no objections to these three recommendations. The Office also recommended that the Commission order the Company to work with parties to expand this report to include the new customers on the Transition Customers (Schedule 136). As this report requires complex and extensive data, the Company plans to work with parties to provide meaningful information in a timely manner to review requirements for both the current and new programs. To this end, the Company intends to work with parties during the first part of 2017 to discuss expansion of the report to include details of the new program.

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Sincerely,

A handwritten signature in blue ink that reads "Joelle Steward". The signature is written in a cursive style with a large initial "J" and a distinct "S" at the end.

Joelle Steward

Vice President, Regulation

CERTIFICATE OF SERVICE

17-035-31

I hereby certify that on November 14, 2017, a true and correct copy of the foregoing was served by electronic mail to the following:

Utah Office of Consumer Services

Cheryl Murray – cmurray@utah.gov

Michele Beck – mbeck@utah.gov

Division of Public Utilities

Chris Parker – chrisparker@utah.gov

William Powell – wpowell@utah.gov

Bob Davis – radavis@utah.gov

Myunghee Tuttle – mstuttle@utah.gov

Rocky Mountain Power

Jana Saba – jana.saba@pacificorp.com



Katie Savarin
Coordinator, Regulatory Operations