ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

1407 W North Temple, Suite 330
Salt Lake City, Utah 84114

July 5, 2018

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. 17-035-61 – In the Matter of the Application of Rocky Mountain Power to Establish Export Credits for Customer Generated Electricity**

In accordance with Utah Code Ann. §§ 54-17-501, 63G-4-301 and Utah Administrative Code § 746-1-801, Rocky Mountain Power, a division of PacifiCorp (the "Company") hereby submits its response to the Petition for Review or Rehearing of Vote Solar, Vivint Solar, Inc., and Utah Clean Energy filed June 20, 2018 with the Public Service Commission of Utah.

The Company respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

By E-mail (preferred): datarequest@pacificorp.com
utahdockets@pacificorp.com
Jana.saba@pacificorp.com
Yvonne.hogle@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

Informal inquiries may be directed to Jana Saba at (801) 220-2823.

Sincerely,

Joelle Steward
Vice President, Regulation

Service List: Docket No. 17-035-61

R. Jeff Richards (7294)
Yvonne R. Hogle (7550)
1407 West North Temple, Suite 320
Salt Lake City, Utah 84116
Telephone No. (801) 220-4050
Facsimile No. (801) 220-3299
E-mail: robert.richards@pacificorp.com
yvonne.hogle@pacificorp.com

Attorneys for Rocky Mountain Power

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power to Establish Export Credits for Customer Generated Electricity	Docket No. 17-035-61 **RESPONSE TO JOINT PETITION FOR REVIEW OR REHEARING**

In accordance with Utah Code Ann. §§ 54-17-501, 63G-4-301 and Utah Administrative Code § 746-1-801, Rocky Mountain Power, a division of PacifiCorp (the "Company") hereby submits this response to the Petition for Review or Rehearing of Vote Solar, Vivint Solar, Inc. and Utah Clean Energy (the "Joint Parties") filed June 20, 2018 with the Public Service Commission of Utah (the "Petition"). The Petition asks the Public Service Commission of Utah (the "Commission") to "review or rehear" certain issues in the Commission's order in the above-captioned docket issued May 21, 2018 (the "Interim Order"). This response demonstrates why the relief requested should be denied.

INTRODUCTION

The Joint Parties petition this Commission to rehear arguments made by them at the April 17, 2018 hearing of this matter in ways that are more aligned with rulings the Joint Parties had hoped to receive, but lost. They fail to identify a properly preserved argument that they show was decided erroneously, contrary to Utah law, or factually goes against the evidence in the record.

Accordingly, there is no reason to hold a rehearing or issue a new order based on the Joint Parties' arguments.

ARGUMENT

The Joint Parties are interested in collecting as much information as possible to justify a substantial credit rate for exported energy to use in and "beyond this proceeding."[1] The Commission, by contrast, is interested in meeting its obligation to determine "just and reasonable rates" under applicable statutes, including a just and reasonable export credit rate for customer generated electricity, in accordance with applicable statutes and the Commission-approved Settlement Stipulation dated September 29, 2017 in Docket No. 14-035-114 (the "Stipulation"). The Commission, unlike the Joint Parties, must evaluate the relevant costs and benefits in determining the appropriate export credit rate without the overlay of special interests and consistent with the overall public interest.

Based on the recommendations of the parties in this docket, the Commission issued a scheduling order segregating the matter into two phases and setting forth deadlines in Phase I for a load research workshop, several rounds of testimony and a hearing. The Commission issued its Interim Order directing the Company to modify its proposed load research study (the "LRS") to assist in the final determination of a just and reasonable export credit rate. In response, the Joint Parties raise several arguments in support of their Petition. As shown below, each of those arguments fail.

[1] *See* direct testimony of Kate Bowman for Utah Clean Energy, ll. 244-246. Also, Christopher Worley testifies that some of the information has the potential of influencing hundreds of millions of dollars of customer and utility investment, and that some can be used to understand the impact that customer generation ("CG") systems have on the air quality along the Wasatch Front. *See* direct testimony of Christopher Worley of Vivint Solar, ll. 41-42 and 45-46.

A. The Commission Reached Proper Conclusions and Made Appropriate Findings Regarding the LRS, Deciding All Issues Requiring Resolution in Phase I in Accordance with Applicable Statutes and the Stipulation.

1. The Interim Order is not final agency action.

The Joint Parties attack the Commission's findings, requesting the review or rehearing of several issues. Specifically, the Joint Parties contend that the Commission must require the Company to "… a) rectify the four flaws identified by Dr. Albert Lee with the LRS's sample design;"[2] b) provide information from "relevant populations necessary to allow the Intervenors to meet their burden of proof in Phase II …";[3] and, c) "resubmit its updated LRS so [they can] have the opportunity to ensure the [ ] LRS complies with the Commission's order."[4]

As the Commission noted in its Interim Order, its findings in Phase I are not final agency action. Quoting the parties' agreement in the Stipulation that "nothing from the November 2015 Order or other aspects of … Docket No. 14-035-114 will: (a) limit or preclude a Party from presenting evidence in the Export Credit Proceeding …, or (b) be precedential in the Export Credit Proceeding or any future case," the Commission found that it will not "prejudge the relevancy of any issue that could influence the outcome of the proceeding prior to having a full record …"[5] — meaning before the conclusion of Phase II of this matter. The Commission further noted that its Interim Order does not preclude a party from challenging an issue during Phase II based on an alleged deficiency in the LRS.[6] This means that the Company must continue to defend the appropriateness of the modified LRS in Phase II. Thus, contrary to the Joint Parties' contentions, the Interim Order does not impair their ability to meet their burden of proof in Phase II.

[2] Petition, at 2.
[3] *Id*.
[4] *Id.*
[5] Interim Order, at 16.
[6] *Id.*, at 18.

2. Approval of the LRS is neither necessary nor required before the Phase II proceedings, and is consistent with the Stipulation stating that nothing will limit or preclude a party from presenting evidence in the export credit rate proceeding (including Phase II).

Consistent with the agreement that parties will not be precluded from presenting evidence or challenging any issues in the export credit rate proceeding (including Phase II), the Commission found that "no legal requirement exist[ed] in statute, administrative rule, tariff, stipulation, or PSC Order that require[d] PacifiCorp to obtain PSC approval before conducting its LRS."[7] The Commission acted within its authority in directing the Company to make modifications to the LRS, without expressly approving or rejecting the Company's proposed LRS. Given the parties' agreement in the Stipulation that nothing can foreclose their ability to present evidence in the export credit rate proceeding (including Phase II), a rejection or approval of the LRS before Phase II, if at all, could be interpreted by parties in Phase I as a violation of the Stipulation. Therefore, the Commission correctly found that approval of the LRS is neither necessary nor required in Phase I of this matter.

3. The Commission has ample authority and discretion to decline to require the Company to collect information the Joint Parties believe should be collected on their behalf.

The Company agrees with the Joint Parties that the Commission has the authority to adopt any method of rate regulation consistent with Utah Code Ann. § 54-4-4.1(1). It has considerable latitude in performing its rate-regulation functions. In interpreting this authority, the Utah Supreme Court concluded that [a]ny activities of a utility that actually affect [the utility's] rate structure would necessarily be subject to some degree to the [Commission's] broad supervisory powers in relations to rate.[8]

[7] Interim Order, at 18.
[8] *Kearns-Tribune Corp. v. Pub. Serv. Comm'n of Utah*, 682 P.2d 858, 860 (Utah 1984).

Relying on this law, the Joint Parties then argue that the Commission's Interim Order is susceptible to judicial challenge when, in exercising the broad powers and considerable latitude granted by the Legislature and endorsed by the Utah Supreme Court, the Commission declined to require the collection of data the Joint Parties deem to be relevant for use in Phase II. The Joint Parties also reference Utah Code Ann. § 54-15-105.1 (the "Statute") and the Stipulation to support their flawed argument.

First, the argument that the Commission cannot decline to require the collection of information for the Joint Parties under the broad powers and considerable latitude in its capacity to set rates, is incongruous. In addition, neither the Statute which states, in part, "the governing authority shall: … (2) determine a just and reasonable charge, credit, or ratemaking structure, including new or existing tariffs, in light of the costs and benefits," nor the Stipulation at ¶ 30, which states that "the Commission will determine a just and reasonable rate for export credits for customer generated electricity", mandates that the Commission require the Company to collect "data to be used in assessing the costs and benefits of solar energy in the future."[9] The Commission acted within its ample authority in declining to require the Company to collect data the Commission found was not sufficiently valuable to warrant collection by the Company. What the Statute does mandate is that the Commission assess data that will allow the consideration of costs and benefits that are actually incurred by the Company and its customers, in the determination of an appropriate export credit rate.

The "costs and benefits" in the Statute that the Joint Parties rely on may not be applicable in this case because export credit rates may not fall under the Statute. However, even assuming it

[9] Petition, at 3.

were applicable, it must be read in the context of subsection (1) of the Statute.[10] The Statute provides the Commission must:

> (1) determine, after appropriate notice and opportunity for public comment, whether costs that the electrical corporation or other customers will incur from a net metering program will exceed the benefits of the net metering program, or whether the benefits of the net metering program will exceed the costs; and
>
> (2) determine a just and reasonable charge, credit or ratemaking structure, including new or existing tariffs, in light of the costs and benefits.

Utah Code Ann. § 54-15-105.1 (hereafter, § 54-15-105.1(1) is referred to as "Subsection One" and § 54-15-105.1(2) as "Subsection Two").

In determining just and reasonable rates for exported electricity, the plain language of Utah Code Ann. § 54-15-105.1(1) limits the scope of the consideration to actual costs incurred and benefits accrued by the Company and its other customers. In other words, Subsection One requires the Commission to consider the costs and benefits that accrue to the utility or its other customers in their capacity as ratepayers of the utility. Therefore, any data to be collected that will inform the consideration of costs or benefits that have an actual impact on the Company's cost of service will be useful in the final determination of just and reasonable export credit rates.

Customer generator production, and the tilt, orientation or shading of solar panels are not necessary for the design or creation of export credit rates. *See Hrg. Tr.* p. 111, ll. 11-14; p. 157, ll.19-25 and 158, ll. 1-5; p. 158, ll. 23-25 and p. 159, ll. 1-13. And knowing the types and number of air conditioners, electric vehicles, appliances and light sources would be interesting but can be and often are replaced by customers. *See* Hrg. Tr. p. 137, ll. 17-21. The utility and value of collecting this type of information is at best questionable. And there is nothing in Utah law, the

[10] The first part of the Statute is highly relevant to the rates that are set under Subsection Two because Subsection Two directs the Commission to "determine a just and reasonable charge … *in light of the costs and benefits."* found under Step One.

Stipulation or under any tariff that obligates the Company to collect it. Therefore, the Commission's finding that the record does not support a regulatory requirement for the Company to collect such data on the Joint Parties' behalf is reasonable and in the public interest. The Interim Order notwithstanding, the Joint Parties can attempt to collect any information they deem is relevant for Phase II.

B. The Commission Correctly Found that the Proposed LRS, with the Required Modifications, Will Provide a Reasonable Basis on which to Determine an Appropriate Export Credit Rate

1. The Commission's finding that the most relevant information needed to provide a reasonable basis on which to determine a just and reasonable export credit rate is the volume of exported energy and the times that the energy is exported is reasonable and supported by evidence.

The Joint Parties argue that the Commission did not '"provide direction towards a meaningful LRS"'[11] implying that the Commission failed to evaluate the LRS to determine if it is appropriately designed to collect the data necessary to determine a just and reasonable export credit rate. The Joint Parties are wrong. The Commission concluded that the information to be collected from the Company's proposed LRS, as modified by the Interim Order, will provide a reasonable basis on which to determine an appropriate export credit rate.[12]

For example, the Commission found that the "most relevant information for that analysis is the volume of electricity that is exported to the distribution system and the times when that electricity is exported."[13] No Joint Party argues that the timing and magnitude of the energy that is being exported to the grid is not relevant in the determination of a just and reasonable export credit rate, and at least one acknowledges that they are important factors to consider. *See* Hrg. Tr. p. 135, 21-23. While the Joint Parties request information that may affect exported electricity (s*ee*

[11] Petition, at 3 (quoting the Interim Order, at 16).
[12] Interim Order, at 18.
[13] *Id.*

Hrg. Tr. p. 166, ll. 17-24), the best information the Company has or will have is actual exported electricity from the entire Schedule 136 customer population. *See*, Id. The Commission indicated that the LRS, as modified, will collect this relevant data.[14] The Commission also directed the Company to make the following modifications to the LRS: a) select new samples for residential and commercial customers that either give each member of the class an equal chance of being selected, or each member of the separate strata an equal chance on being selected; b) increase the sample size to accommodate the separate study of residential and commercial customers; and c) collect export, import, and production data from the existing LRS study's 36 Schedule 135 participants.[15]

Consistent with the Commission's finding that the most relevant information is the volume of exported electricity and the times when electricity is exported, the proposed two-part LRS, as modified, is designed first, to collect and measure electricity exported to the distribution system from, and delivered electricity to, Schedule 136 transition customers.

2. Although customer-specific energy generation data is not needed in the final determination of an appropriate export credit rate, the LRS, as modified, addresses many of the concerns raised by the Joint Parties in the Petition.

    a. *The primary "population of interest" does not currently exist; but the modified LRS was designed to draw from both Schedules 135 and 136 customers, in any event.*

The focus of the Joint Parties' concerns with the proposed LRS is with the second component of the LRS which is designed to collect and measure customer energy generation data. Specifically, the Joint Parties criticize the final customer generation sample on the basis that it 1) was not drawn from the "population of interest" and 2) is a product of two separate samples created using two different sampling designs.[16]

[14] *Id.*
[15] *Id.*, at 16-17.
[16] Petition, at 9.

Before explaining how the modified LRS addresses most of the Joint Parties' concerns, it is important to note that customer-specific energy generation data is not necessary in the final determination of an appropriate export credit rate since the LRS is designed to collect exported electricity data from the entire Schedule 136 customer population, which is the most currently available "population of interest". See Rebuttal testimony on Kenneth Lee Elder Jr., ll. 55-58 and Hrg. Tr. p. 57, ll. 3-21. However, since exported electricity is a function of customer energy generation, customer consumption and energy delivered to the customer, the Company determined that collecting customer-specific generation data could be useful for understanding the intertemporal relationship between full-requirements energy and customer generated solar production.

Regarding the concern that the sample was not drawn from the "population of interest", the export credit rates to be determined in Phase II of this matter will immediately apply to post transition customers who install private customer generation equipment after the conclusion of this matter, post 2020 ("Schedule 137 customers"), a population that currently does not exist. Dr. Lee's concern regarding the "population of interest" was based on his understanding that data from Schedule 135 customers was being extrapolated to Schedule 136 customers and that rates were being designed for these Schedule 136 customers. In fact, the export credit rates will not apply to Schedule 135 or 136 customers until 2036 and 2033, respectively (i.e., for another 15 – 18 years). The export credit rates will apply only to Schedule 137 customers until 2033. When asked about it during the April 17, 2018 hearing, Dr. Lee testified that he was unaware of this. See Hrg. Tr. p. 220, ll. 8-13. In response to a question of whether "any information [taken] from Schedules 135 or 136, [ ] would be improper to extrapolate […] to [Schedule] 137 customers," Dr. Lee responded that "[i]t would be improper to infer, uncorrected, unmodified, you know, to – to a population *that*

is not part of the sample." Emphasis added. Hrg. Tr. p. 221, ll. 8-16. The Joint Parties have not addressed the fact that the "population of interest", i.e., Schedule 137 customers, does not yet exist nor have they proposed an alternative solution given Schedule 137 customers are the primary population of interest. Therefore, it is reasonable for the Company to continue to use the most up to date and only data available for its sample.

b. *The modified LRS was drawn from a population of both Schedules 135 and 136 customers which included a total of 360 Schedule 136 customers who had an equal probability of being selected. The modified LRS consists of a larger sample size of 105 customers.*

Next, the Joint Parties raise a concern about the co-mingling of sample designs of the LRS and its sample size.[17] Consistent with the Commission's direction, the Company selected new and separate samples for residential and commercial customers that gave each member of Schedule 135 and Schedule 136 an equal chance of being selected. Specifically, the modified LRS will collect and measure customer generation data from a new 105 Schedule 135 customer sample: 45 for the residential sample and 60 for the non-residential sample. The Company increased the sample size to accommodate the separate study of residential and commercial customers, and included a total of 360 Schedule 136 customers as part of the residential population who had an equal probability of being selected. Despite this, no Schedule 136 customers were selected for the proposed sample as part of the random selection process. The Joint Parties' concerns about the co-mingling of sample designs and the sample size are therefore moot.

c. *The Company will continue to collect generation, exported and delivered energy from the 36 Schedule 135 customers, which were part of the sample used in the net metering proceeding in Docket No. 14-035-114.*

[17] *Id.*, at 10 and 11.

The new 105 customer generation sample excludes the original 36 Schedule 135 customer sample used in Docket No. 14-035-114. However, consistent with the Commission's direction in the Interim Order, the Company will continue to collect generation, export and delivered data from all 36 Schedule 135 participants from the original sample used in Docket No. 14-035-114. Although the 36 Schedule 135 participants are not part of the modified LRS, the Company will collect the full set of generation, export and delivered data from one set of participants that may provide useful information for Phase II.

d. Nameplate capacity is the best available variable of interest for the sample design given its correlation with customer energy generation.

The Joint Parties also raise a concern that the assumption regarding the correlation between nameplate capacity and generation could result in the sample size being too small to achieve the stated precision.[18] Dr. Lee testified that the correlation between nameplate and generation for the 30 out of the 36 customers that would fall into the first stratum was lower (0.68) than the 36 customer sample overall (0.93), concluding that nameplate capacity was not as highly correlated with generation. See Hrg. Tr. p. 216, ll. 22-25; p. 216, ll. 1-2.

Specifically, Dr. Lee testified that there was "insufficient evidence showing, by stratum, the strong correlation between capacity and generation." Hrg. Tr. p. 216, ll. 9-11. But Dr. Lee was not clear about what his conclusions meant for purposes of moving forward with the sample. For example, Dr. Lee was later asked whether the existence of the outliers that were included in the 30 of the 36 Schedule 135 customers in the original sample (which he testified gave rise to the high correlation between nameplate capacity and customer energy generation), invalidated Mr. Elder's correlation conclusion. Dr. Lee responded that "… it does not make it invalid." Hrg. Tr. p. 232,

[18] Petition, at 12.

ll. 2-10. He also testified that "Mr. Elder calculates his correlation correctly. But to derive a high level of confidence from that calculation, based on among other things, 36 customers and only a tiny little handful of them actually give rise to that strong correlation, […], we should take a pause and appropriately be cautious before we move forward." Hrg. Tr. p. 233, ll. 11-17. When asked about what a reasonable cutoff for determining whether the correlation is sufficient to move forward or not, Dr. Lee testified that he did not have a very strong opinion about it. Hrg. Tr. p. 222, ll. 17-22.

The Company based its correlation analysis on all of the 36 customers and found the relationship between generation and nameplate capacity to be the strongest relative to the correlation of generation to exports, delivered and full-requirements. It does not appear that Dr. Lee conducted the same analysis for the 30 that fall within the first strata which determined his correlation between generation and nameplate (0.68), to find the correlation of generation and exports, generation and delivered, and generation and full-requirements. Therefore, the Company's reliance on nameplate capacity to design its generation sample is reasonable given the result of a lower correlation of other available data relative to nameplate capacity, when using a uniform, consistent analysis applicable to all variables of interest.

The purpose of the customer generation sample is to calculate a representative sample of customer energy generation output; thus, the variable of interest for the sample would be customer energy generation output. However, the Company does not have access to this data and another variable of interest that is shown to be correlated must be used. Based on information obtained from the original sample using 36 Schedule 135 customers, the Company determined that nameplate capacity was the best variable of interest to use for the sample design. See Rebuttal testimony of Kenneth Lee Elder Jr., ll. 96-100. While Dr. Lee questioned Mr. Elder's testimony

of the existence of a high correlation between nameplate capacity and customer generation data, Dr. Lee testified that a lower correlation does not invalidate Mr. Elder's conclusions. And he further testified that he did not have a strong opinion regarding what a reasonable correlation would have to be to move forward with the sample design.

Given that nameplate capacity and private generation are not perfectly correlated, the minimum sample size has been increased to account for potential bias. The modified LRS for the residential sample calls for a minimum of twelve sites to achieve the stated level of precision. However, the minimum number of sample sites has been bolstered to include a total of 45 sites. Further, the minimum number of sample sites required to achieve the stated level of precision for the non-residential sample was found to be 52. This minimum number of sample sites has been increased so that the proposed LRS includes a total of 60 sites. Additionally, as part of the sample design, alternate sites have been selected in the event bias is detected, as described below.

e. *The Company intends to test the results of the LRS for bias before the LRS period begins and at certain intervals during the collection period of the LRS.*

While the Commission did not require the Company to create a contingency plan, the Company will have the opportunity to review the results from many of the production profile meters it will install before the modified LRS begins in January 2019 since it will begin installing profile meters in the late summer/early fall of 2018. The Company will review:

- exported and delivered energy from the residential sample (45 load research meters) and compare it against the exported and delivered energy from the total residential population of Schedule 136 customers;

- exported and delivered energy from the non-residential sample (60 load research meters) and compare it against the exported and delivered energy from the total non-residential population of Schedule 136 customers;
- generated electricity from the residential and non-residential samples and compare it against the National Renewable Energy Laboratory's ("NREL") online PVWatts customer generation curve.

The Company will also test for bias as part of the Company's regular monthly review of the LRS with parties. The Company is currently evaluating several corrective actions it can take if it determines the existence of bias including, among other things, checking the production profile meters for outside factors such as faulty wiring or other mechanical issues that may be causing the bias. If the Company determines there is bias, the Company may replace the production profile meter in the sample with an alternate site. The current LRS includes 155 alternate sites for the 45 residential sample, and 136 alternate sites for the 60 non-residential sample. The Company will continue to evaluate other contingency measures and be prepared to act if bias is shown.

3. The Commission Correctly Found that the Value of the Data the Joint Parties Recommend for Collection Does Not Warrant Requiring the Company to Collect it On Their Behalf. The Company will provide Access to the Information it Collects to the Joint Parties, in Any Event.

Finally, the Joint Parties criticize the proposed LRS because it will not collect production data from Schedule 136 customers and it will not collect "information from all relevant populations regarding export profiles, system characteristics […] and customer characteristics (e.g., "behind-the-meter" data such as large appliances and house or business size) …".[19] The Joint Parties argue that "[u]nderstanding these trends will enable the parties to project how customer usage and

[19] Petition, at 15.

patterns will change in the future and to provide valuable information in determining the costs and benefits of exported energy for *future* solar customers."[20] Emphasis added. The Joint Parties further argue that the changes that can be identified between Schedule 135 and 136 customers can provide insight into how, and more importantly, why exports change over time, which if made available to the Intervenors, can be used to demonstrate *future* costs and benefits of exported energy.[21] Emphasis added.

While much of the information the Joint Parties recommend for collection may be appropriate for long-term forecasting and may be a useful resource planning tool, it should not be used here to set export credit rates that will be applied to customers at the conclusion of this matter. Export credit rates must be just and reasonable. This means that they must be based on actual or reasonably forecast data, not merely speculative. The Company agrees with the Commission that the value of this data does not warrant requiring the added expense and resources for its collection. Moreover, as with all customer rates, as customer usage patterns change over time, the export credit can be modified to account for such changes, if relevant to the value.

In addition, the collection of additional data beyond the information that will be collected with the modified LRS would require unnecessary and added expense, potentially pose safety risks for the Company's employees and could be viewed as invasive. For instance, Mr. Elder testified that installing production meters for a random sample of 4,000 customers would cost approximately $9.3 million. See Hrg. Tr., p. 60, ll. 9-18. Verification about the tilt, orientation and shading may require Company representatives to climb on customers' roofs. See Hrg. Tr. p. 110, ll. 18-25 and p. 111, ll. 1-2. Also, a government-mandated survey about the types of appliances, type of lighting and other similar information in our customers' homes may be viewed as invasive

[20] *Id.*
[21] Petition, at 17.

and inappropriate. See Hrg. Tr. p. 208, ll. 8-25 and p. 209, ll. 1-17. In any event, the Company will collect certain system characteristics including panel orientation and tilt data for customers who submitted interconnection agreements since June 2017 and will share this and all of the information that is either collected or included as part of the interconnection agreements with the Joint Parties upon request

The Company agrees with the Joint Parties that the Commission has the obligation to set just and reasonable export credit rates. The Company also believes that the Commission must act to ensure the best interests of all customers, not just to ensure the special interests of current and future customers with private generation facilities. Much of the information the Joint Parties seek is to evaluate trends and future values of the costs and benefits of customer generation. Using these values in this case risks harming customers who will ultimately be paying for that exported electricity, and are therefore inappropriate and unnecessary. Therefore, the Commission's findings that the LRS, as modified, is appropriate in the determination of an appropriate and just and reasonable export credit rate is correct and supported by the record.

CONCLUSION

For the foregoing reasons, the Interim Order should stand as being lawful and in the public interest. The Commission should deny the Petition on the basis that Petitioners have not met their burden.

RESPECTFULLY SUBMITTED, this 5th day of July, 2018.

Rocky Mountain Power

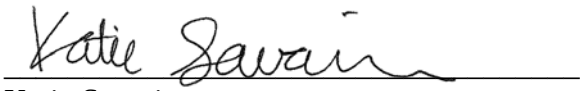
Yvonne R. Hogle

CERTIFICATE OF SERVICE

I hereby certify that on July 5, 2018, a true and correct copy of Rocky Mountain Power's **RESPONSE TO JOINT PETITION FOR REVIEW OR REHEARING** in Docket No. 17-035-61 was served by email on the following Parties:

Division of Public Utilities	
Chris Parker William Powell Erika Tedder	ChrisParker@utah.gov wpowell@utah.gov etedder@utah.gov
Utah Office of Consumer Services	
Michele Beck Cheryl Murray Bela Vastag	mbeck@utah.gov cmurray@utah.gov bvastag@utah.gov
Assistant Utah Attorney General	
Patricia Schmid Justin Jetter Robert Moore Steven Snarr	pschmid@agutah.gov jjetter@agutah.gov rmoore@agutah.gov stevensnarr@agutah.gov
Vivint Solar	
Stephen F. Mecham	sfmecham@gmail.com
Vote Solar	
Rick Gilliam Briana Kobar	rick@votesolar.org briana@votesolar.org
Utah Clean Energy	
Sarah Wright Kate Bowman Hunter Holman	sarah@utahcleanenergy.org kate@utahcleanenergy.org hunter@utahcleanenergy.org
Utah Solar Energy Association	
Amanda Smith Engels J. Tejeda Chelsea J. Davis	asmith@hollandhart.com ejtejeda@hollandhart.com cjdavis@hollandhart.com
Salt Lake City Corporation	
Megan J. DePaulis Tyler Poulson	megan.depaulis@slcgov.com tyler.poulson@slcgov.com
Auric Solar, LLC	
Elias Bishop	elias.bishop@auricsolar.com

Western Resource Advocates	
Jennifer E. Gardner Nancy Kelly	jennifer.gardner@westernresources.org nkelly@westernresources.org
Rocky Mountain Power	
Data Request Response Center Yvonne Hogle Jana Saba	datarequest@pacificorp.com yvonne.hogle@pacificorp.com jana.saba@pacificorp.com; utahdockets@pacificorp.com



Katie Savarin
Coordinator, Regulatory Operations