

Hunter Holman
1014 2nd Avenue
Salt Lake City, UT 84103
801-363-4046
hunter@utahcleanenergy.com
Utah Bar No. 15165
Attorney for Utah Clean Energy

Selendy & Gay PLLC
Joshua S. Margolin
Jennifer M. Selendy
1290 Avenue of the Americas
New York, NY 10104
212-390-9022
jmargolin@selendygay.com
jselendy@selendygay.com
Attorneys for Vote Solar

Stephen F. Mecham
10 W 100 S, Suite 323
Salt Lake City, UT 84101
385-222-1618
sfmecham@gmail.com
Utah Bar No. 4089
Attorney for Vivint Solar, Inc.

Ryan Evans
5406 W 11000 N
Suite 103 PMB #514
Highland, UT 84003
801-509-1201
revans@utsolar.org
Utah Solar Energy Association

Elias Bishop
2310 S 1300 W
West Valley City, UT 84119
801-598-5108
Elias.bishop@auricsolar.com
Auric Solar

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

Joint Motion to Amend Scheduling Order and Request For Technical Assistance

Pursuant to Rule 7 of the Utah Rules of Civil Procedure and Utah Administrative Code R746-1-105, Utah Clean Energy, Vote Solar, Vivint Solar, the Utah Solar Energy Association, and Auric Solar (“the Moving Parties”) hereby move to amend the Scheduling Order in Docket No. 17-035-61 to include two or more technical conferences in the first half of 2019. The technical conferences will provide an opportunity for an independent expert to present to the Parties involved in this Docket and to the Public Service Commission of Utah (“Commission”) on matters relevant to Phase II of the Solar Export Credit proceeding. The Moving Parties further move the Commission to sponsor a technical assistance request to relevant experts including Lawrence Berkeley National Laboratories (“LBNL”), the National Renewable Energy

Laboratory (“NREL”), and the Pacific Northwest National Laboratory (“PNNL”) to provide no-cost technical assistance on topics relevant to the Solar Export Credit proceeding.

On October 2, 2018 the Commission hosted a Status Update on Phase II of Docket 17-035-61 during which Rocky Mountain Power (the “Company”) presented an update on the installation of meters and collection of data for the load research study. Following this update, the parties present at the meeting discussed the remaining schedule in Docket No. 17-035-61. Three rounds of testimony and a hearing are scheduled for February through September 2020, with no official items scheduled for the remainder of 2018 or for 2019.¹

A Settlement Stipulation filed in Docket 14-035-114 resolved issues related to that docket and specified that the Company would file an application to initiate a new docket to determine an export credit rate (the “Export Credit Proceeding,” now Docket 17-035-40) for customer-generated electricity.² The Settlement Stipulation further specifies that:

“In the Export Credit Proceeding, the Commission will determine a just and reasonable rate for export credits for customer generated electricity. Parties may present evidence addressing reasonably quantifiable costs or benefits or other considerations they deem relevant, but the Party asserting any position will bear the burden of proving its assertions (for example, parties may present evidence addressing the following costs or benefits: energy value, appropriate measurement intervals, generation capacity, line losses, transmission and distribution capacity and investments, integration and administrative costs, grid and ancillary services, fuel hedging, environmental compliance, and other considerations). The Commission will also determine the appropriate study period over which to quantify and model export credit components.”³

Beginning in February 2020, Parties involved in this docket will file testimony concerning an export credit rate, including presenting evidence addressing categories of costs and benefits of customer generated electricity. This testimony may include (but will not

¹ Docket No. 17-035-61 Phase II Scheduling Order, Notice of Public Witness Hearing, and Notice of Hearing. January 16, 2018.

² Settlement Stipulation, Docket No. 14-035-114, approved September 29, 2017.

³ Settlement Stipulation, Docket No. 14-035-114 Paragraph 30.

necessarily be limited to) the categories described above. During this proceeding, it will be in the best interest of all parties and the Commission to share a robust understanding of the current methods for quantifying and valuing the costs and benefits of distributed solar, which are more detailed than ever, in order to reach a just and reasonable export credit rate. The technical capabilities of distributed solar are evolving as solar equipment and software is increasingly configured to meet new standards regarding the interconnection of solar (for example, IEEE-1547-2018) or new goals for end-use customers (for example, solar paired with battery storage). These changes in the industry are occurring rapidly – a solar installation completed today has vastly different technical capabilities compared to the distributed solar installations from only a few years ago which have been grandfathered under Schedule 135. The first distributed solar installations to be subject to the new export credit rate may not be installed until late 2020, nearly two years in the future. A fair export credit rate that is representative of the true value of exported energy must account for all costs and benefits associated with modern solar technology. To that end, the parties would benefit from a common understanding of the technical capabilities of distributed solar technology today to better understand what costs, benefits, and information should be considered in the valuation process. Technical assistance from a subject matter expert related to these topic areas will help all parties participating in this docket, including the Commission, to understand data needs and provide relevant direction for quantifying the full costs and benefits of exported solar energy in Utah.

At the October 2, 2018 status update, parties discussed the potential to host the Lawrence Berkeley National Laboratory (“LBNL”) or other experts for a technical conference, and Commission staff suggested that an appropriate way to initiate this request to the laboratory was to submit a petition requesting the Commission to submit a request for technical assistance on

matters relevant to this docket. We request that the Commission initiate a technical assistance request to LBNL, who may then refer portions of the request to the additional laboratories described below. LBNL is a member of the national laboratory system supported by the U.S. Department of Energy through its Office of Science. It is managed by the University of California and is charged with conducting unclassified research across a wide range of scientific disciplines. The LBNL Electricity Markets & Policy Group informs public and private decision-making within the U.S. electricity sector through independent, interdisciplinary analysis of critical electricity policy and market issues and has more than 30 years of experience evaluating a wide variety of technical, economic, and regulatory policy issues. LBNL is able to provide no-cost technical assistance to eligible entities, which includes state regulatory commissions, on behalf of the U.S. Department of Energy Office of Electricity and Solar Energy Technologies Office. This technical assistance is strictly limited to education based on the research and findings conducted at LBNL—the organization does not advocate for any position or technology.

The National Renewable Energy Laboratory (“NREL”) is funded through the U.S. Department of Energy and specializes in renewable energy and energy efficiency research and development. In addition to conducting research on renewable energy technologies, NREL operates the Energy Systems Integration Facility which explores technical, operational, and financial risks of integrating emerging energy technologies into today’s grid, and the Grid Modernization program which investigates improvements to make the grid more flexible, reliable, resilient, secure, and sustainable.

The Pacific Northwest National Laboratory (“PNEL”) is managed by the U.S. Department of Energy Office of Science and conducts research on a variety of topics related to

energy and the environment, science, and national security. Of relevance to this request, two PNNL core research areas are renewable energy and electricity infrastructure.

Technical assistance requests to the national laboratories described above must come from an eligible state entity, which, in this case, is the Commission. The Moving Parties respectfully request that the Commission submit a request for technical assistance related to quantifying the export credit rate at two technical workshops in the first half of 2019. We recommend that the Commission submit a technical assistance request first to LBNL.⁴ Following this initial request, LBNL could recommend points of contact at NREL, PNNL, or other laboratories to initiate requests for topics best addressed by those laboratories. Based on a review of technical materials, we suggest that the laboratories could provide technical assistance regarding valuation methodologies and data needs for calculating costs and benefits related to the following topics and questions, although we welcome the addition of any relevant topics or questions that the Commission or other parties would like to include:

- Potential costs associated with integration of distributed solar energy on the distribution and transmission system at varying levels of penetration
- Impact of distributed solar on transmission and distribution line losses
- Potential for distributed solar to impact timing and need for capital investments on the distribution and transmission system
- Other distribution-level costs and benefits attributable to distributed solar, including locational costs and benefits
- Impact of other distributed technologies in conjunction with distributed solar

⁴ The LBNL Technical Assistance Request Form may be found at the following website: <https://emp.lbl.gov/research/technical-assistance-states>.

- Short-term vs. long-term evaluations of the costs and benefits of distributed solar
- Measurement intervals for netting of solar electricity
- Ancillary services provided by distributed generation, including voltage and frequency regulation
- Other topics, as requested by the Commission or other parties

Conclusion.

Utah Clean Energy, Vote Solar, Vivint Solar, the Utah Solar Energy Association, and Auric Solar respectfully move to amend the Scheduling Order in Docket No. 17-035-61 to include two technical conferences in the first half of 2019. The Moving Parties further move to request that the Commission sponsor a technical assistance request to Lawrence Berkeley National Laboratories and other national laboratories, as appropriate, to provide no-cost technical assistance on topics relevant to the Solar Export Credit proceeding.

DATED November 30, 2018.

/s/ Hunter Holman
 Hunter Holman (15165)
 1014 2nd Avenue
 Salt Lake City, UT 84103
 801-363-4046
 hunter@utahcleanenergy.com
Attorney for Utah Clean Energy

/s/ Joshua Margolin
 Selendy & Gay PLLC
 Joshua S. Margolin
 Jennifer M. Selendy
 1290 Avenue of the Americas
 New York, NY 10104
 212-390-9022
 jmargolin@selendygay.com
 jselendy@selendygay.com
Attorneys for Vote Solar

/s/ Stephen Mecham
 Stephen F. Mecham
 10 W 100 S, Suite 323
 Salt Lake City, UT 84101
 385-222-1618
 sfmecham@gmail.com
 Utah Bar No. 4089
Attorney for Vivint Solar, Inc.

/s/ Ryan Evans

Ryan Evans
5406 W. 11000 N.
Suite 103 PMB #514
Highland, UT 84003
(801) 509-1201
revans@utsolar.org
*Utah Solar Energy
Association*

/s/ Elias Bishop

Elias Bishop
2310 S 1300 W
West Valley City, UT 84119
(801) 598-5108
Elias.bishop@auricsolar.com
Auric Solar

CERTIFICATE OF SERVICE
Docket No. 17-035-61

I hereby certify that a true and correct copy of the foregoing was served by email this 30th day of November, 2018, on the following:

ROCKY MOUNTAIN POWER

Yvonne Hogle	yvonne.hogle@pacificorp.com
Joelle Steward	joelle.steward@pacificorp.com
Jana Saba	jana.saba@pacificorp.com
Utah dockets	utahdockets@pacificorp.com
Data Request Response Center	datarequest@pacificorp.com

DIVISION OF PUBLIC UTILITIES

Patricia Schmid	pschmid@agutah.gov
Justin Jetter	jjetter@agutah.gov
Chris Parker	chrisparker@utah.gov
William Powell	wpowell@utah.gov
Erika Tedder	etedder@utah.gov
DPU Data Request	dpudatarequest@utah.gov

OFFICE OF CONSUMER SERVICES

Steven Snarr	stevensnarr@agutah.gov
Robert Moore	rmoore@agutah.gov
Michele Beck	mbeck@utah.gov
Cheryl Murray	cmurray@utah.gov
Bela Vastag	bvastag@utah.gov

UTAH SOLAR ENERGY ASSOCIATION

Amanda Smith	asmith@hollandandhart.com
Ryan Evans	revans@utsolar.com
Engels J. Tejada	ejtejedaa@hollandhart.com
Chelsea J. Davis	cjdavis@hollandhart.com

SALT LAKE CITY CORPORATION

Tyler Poulson	tyler.poulson@slcgov.com
Megan J. DePaulis	megan.depaulis@slcgov.com

UTAH CLEAN ENERGY

Sarah Wright	sarah@utahcleanenergy.org
Kate Bowman	kate@utahcleanenergy.org
Hunter Holman	hunter@utahcleanenergy.org

VOTE SOLAR

Rick Gilliam
Briana Kobor
Joshua S. Margolin
Jennifer M. Selendy

rick@votesolar.org
briana@votesolar.org
jmargolin@selendygay.com
jselendy@selendygay.com

VIVINT SOLAR

Stephen F. Mecham

sfmecham@gmail.com

WESTERN RESOURCE ADVOCATES

Nancy Kelly
Steven S. Michel
Sophie Hayes

nkelly@westernresources.org
smichel@westernresources.org
sophie.hayes@westernresources.org

AURIC SOLAR

Elias Bishop

elias.bishop@auricsolar.com

/s/ Hunter Holman

Hunter Holman (15165)

1014 2nd Avenue

Salt Lake City, UT 84103

801-363-4046

hunter@utahcleanenergy.com

Attorney for Utah Clean Energy