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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of the Application of Rocky	)	Docket No. 17-035-61
Mountain Power to Establish Export Credits for	)	
Customer Generated Electricity	)	Response to Joint Motion to
	)	Amend Scheduling Order and
	)	Request for Technical Assistance
_____	)	

Pursuant to Utah Code § 54-10a- 301 and Utah Admin. Code r. 746-100, the Office of Consumer Services (“Office”) files this Response to the November 30, 2018 Joint Motion to Amend Scheduling Order and Request for Technical Assistance. (“Joint Motion”). While the Office does not oppose the Motion, the Office notes that the parties have already had significant opportunities to present evidence and arguments in this case. Accordingly, in order not to waste the parties’ and the Public Service Commission’s (“Commission”) time and resources any questions or issues presented to any proposed expert should be narrowly drawn to address the specific issues presented in the instant docket and not duplicative of evidence and arguments already presented or within the parties capacity to bring forward.

## **BACKGROUND**

On November 30, 2018, several Parties filed a Joint Motion to Amend Scheduling Order and Request for Technical Assistance seeking to amend the Scheduling Order to allow for two or more technical conferences in 2019 and asking the Commission to issue a technical assistance request to Lawrence Berkeley National Laboratory (LBNL)<sup>1</sup> to provide no-cost technical assistance on matters relevant to the Solar Export Credit proceedings. Joint Motion at 1-2. The moving parties assert that there is ample time for additional technical conferences in 2019, additional technical assistance is warranted to address rapid evolution in the distributed solar industry, and several national laboratories offer to provide state regulatory commissions with no-cost technical assistance on issues relevant to the instant docket. *Id.* at 2-5. The Joint Motion also provides a non-exclusive list of possible topics for the request for technical assistance and the proposed technical conferences.

## **ARGUMENT**

The Office does not oppose the Joint Motion in principle and believes that technical assistance may be useful if the request for assistance is narrowly drawn to address specific calculations of costs and benefits of distributed solar and provide data relating to these costs and benefits calculations. However, given the work that has already taken place in this docket, care should be taken to prevent seeking assistance with issues that are overly broad, irrelevant and/or redundant resulting in a waste of the parties and this Commission's time and resources. For example, given the unique nature of the Utah settlement and the progress that has already been made in the various dockets addressing net metering including the current export credit proceeding, a survey of other state's approaches to valuing exported solar energy would not be

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<sup>1</sup> LBNL may refer portions of the request to additional laboratories in the national laboratory system.

helpful. Some of the proposed issues in the Joint Motion also would not be of value, such as the suggestion for technical assistance regarding “measurement of intervals for netting of solar electricity.” *Id.* at 6. This issue is largely a question of policy and is well within the technical capability of the parties to analyze. In contrast, the Office believes that technical assistance focused on specific methods to calculate potential benefits and costs associated with rooftop solar, including the appropriate data to seek and collect, could provide specific value to the current process.

The Commission is the only entity with authority to request technical assistance from the national laboratories through the auspices of the Department of Energy, Office of Electricity. *Id.* at 5; <https://emp.lbl.gov/research/technical-assistance-states>. Therefore, the Commission can act as a gatekeeper regarding the questions and issues presented to the national laboratories in its request for assistance. In this role, the Commission should guard against seeking technical support on issues that are duplicative of work already done, irrelevant to the precise question of costs and benefits presented in this docket, turn on questions of policy or are within the technical capacity of the parties. With this proviso, the Office does not oppose the Joint Motion.

### **CONCLUSION**

The Office does not oppose the Joint Motion. However, to promote an efficient use of regulatory resources, the Commission in crafting any request for technical assistance to the national laboratories should ensure that the issues or questions proposed are not duplicative, irrelevant or overly broad.

Respectfully submitted, December 17, 2018.

/s/ Robert J. Moore  
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