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December 17, 2018

***VIA ELECTRONIC FILING***

Utah Public Service Commission  
Heber M. Wells Building, 4<sup>th</sup> 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**

Rocky Mountain Power (the “Company”) hereby submits its response to the Joint Motion to Amend Scheduling Order and Request for Technical Assistance filed November 30, 2018 by Vote Solar, Vivint Solar, Inc., Utah Clean Energy, Utah Solar Energy Association, and Auric Solar 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:

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Sincerely,

  
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**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 <b>RESPONSE TO JOINT MOTION TO AMEND SCHEDULING ORDER AND REQUEST FOR TECHNICAL ASSISTANCE</b>
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**INTRODUCTION**

In accordance with Utah Administrative Code § 746-1-301, Rocky Mountain Power, a division of PacifiCorp (the “Company”) hereby submits this response to the Joint Motion to Amend Scheduling Order and Request for Technical Assistance filed November 30, 2018 by Vote Solar, Vivint Solar, Inc., Utah Clean Energy, Utah Solar Energy Association, and Auric Solar (the “Joint Parties”) with the Public Service Commission of Utah (the “Motion”). The Motion asks the Public Service Commission of Utah (the “Commission”) to 1) “amend the Scheduling Order in [this] [d]ocket [ ... ] to include two or more technical conferences in the first half of 2019”; and 2) “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” this proceeding.<sup>1</sup> For the reasons set forth below, the Commission should deny the Joint Parties’ first request. The Company takes no position regarding the Joint Parties’ second request.

**The Scheduling Order (as defined below) already includes a reference to informal workshops and discussions; thus, there is no need to amend it.**

On January 10, 2018, the Commission held a scheduling conference (“Scheduling Conference”) to set deadlines in Phase II of this Docket. The Commission subsequently issued its Phase II Scheduling Order, Notice of Public Witness Hearing, and Notice of Hearing January 16, 2018 (“Scheduling Order”). The Scheduling Order states as follows “[p]arties wish to convey they intend to hold a series of informal meetings and discussions, which parties will coordinate and organize themselves. For further information, please contact the Division of Public Utilities via electronic mail at: [dpudatarequest@utah.gov](mailto:dpudatarequest@utah.gov).” The Parties considered holding technical conferences during the Scheduling Conference and determined to hold informal workshops and meetings instead, as reflected in the Scheduling Order. Therefore, it is not necessary to amend the Scheduling Order.

**The Commission should continue its practice of not participating in informal technical workshops and of excluding any materials provided at such meetings from the record.**

In this Docket’s predecessor docket, Docket No. 14-035-114 (“Net Metering docket”), the Commission similarly scheduled informal workgroup meetings and discussions pursuant to its First Order Amending Scheduling Order and Notices of Work Group Meetings, Hearing and Public Witness Hearing, issued March 19, 2015 (“NEM Scheduling Order”). Although the NEM Scheduling Order provides specific dates and times for the informal workshops, unlike the Scheduling Order in this Docket, the Commission indicated therein that “[n]either the

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<sup>1</sup> Petition, p.1.

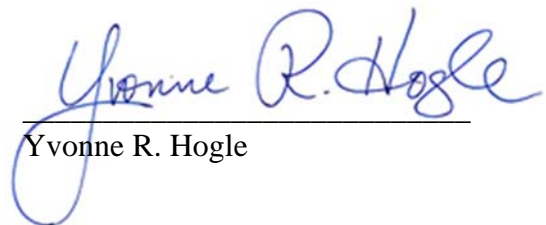
Commission nor its staff will participate in the workshop meetings ...” and that “the content or the materials provided at such meetings will not become part of the record in this docket.”<sup>2</sup> The Commission’s determination was partly due to parties’ concern in that docket that any discussions and materials concerning the issues that would be litigated should be addressed as part of testimony that will be reviewed and considered in the evidentiary hearing and subject to cross examination. The Company’s concerns and position regarding those issues have not changed in this docket. The informal technical workshops and discussions which are already reflected as such in the Scheduling Order should remain informal, just as they were in the NEM Scheduling Order. In addition, it is appropriate for the Commission to continue its practice of not participating in these informal workshops and of excluding the materials provided at such meetings from the record. Parties have the opportunity to include any materials from the informal technical workshops in their testimony which will be reviewed and considered in the evidentiary hearing and be subject to cross examination.

### **CONCLUSION**

Based on the foregoing, the Company recommends that the Commission deny the Joint Parties’ Motion. The Scheduling Order already contemplates informal workshops and discussions. The Company recommends that the Joint Parties reach out to all Parties to discuss the process, timing and content of the informal technical workshops they desire to hold.

RESPECTFULLY SUBMITTED,

ROCKY MOUNTAIN POWER

  
Yvonne R. Hogle

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<sup>2</sup> NEM Scheduling Order, p. 4.

## CERTIFICATE OF SERVICE

I hereby certify that on December 17, 2018, a true and correct copy of Rocky Mountain Power's **RESPONSE TO JOINT MOTION TO AMEND SCHEDULING ORDER AND REQUEST FOR TECHNICAL ASSISTANCE** in Docket No. 17-035-61 was served by email on the following Parties:

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