

March 7, 2019

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
Comments on Joint Reply to the Public Service Commission’s January 25, 2019 Order

On January 25, 2019, the Public Service Commission of Utah (“Commission”) issued an Order Denying Joint Motion to Amend Scheduling Order and Granting Request for Technical Assistance (“Order”) requiring Utah Clean Energy, Vote Solar, Vivint Solar, the Utah Solar Energy Association, and Auric Solar (collectively, the “Moving Parties”) to make a filing within 30 days to a) identify the appropriate Lawrence Berkeley National Laboratory (“LBNL”) staff member to whom the Technical Assistance (“TA”) Request Form should be sent, and b) complete the TA Request Form, which was attached to the Order. On February 21, 2019, the Moving Parties filed a proposed TA Request Form. The Order provided for a comment period on the Moving Parties submission within 15 days of the filing. Rocky Mountain Power (“Company”) hereby submits comments on the Moving Parties’ TA Request Form.

Rocky Mountain Power’s Response to the Moving Parties’ Proposed Technical Assistance Form

Generally, the Moving Parties’ request in the “Electricity Policy Technical Assistance Program” TA Request Form is beyond the scope of what should reasonably be considered in this proceeding. Although the requested technical assistance will be presented in an informal workshop that will not be used to set the parameters or scope of the evidence to be presented in the formal evidentiary proceeding,¹ it should nevertheless be limited to a few topics that can be sufficiently covered in one day. The long list of topics outlined by the Moving Parties is too expansive and not sufficiently focused enough to be of much value to the parties. The Company also notes that the list of proposed topics includes subject areas that were evaluated in the numerous workshops that were held in this proceeding’s predecessor docket (Docket No. 14-035-114).

In addition, the Key Tasks and Deliverables section at the end of the TA Request Form indicates June 30, 2019, as a proposed date for the Technical Workshop, which is a Sunday. The Company assumes this is an oversight by the Moving Parties, and recommends the Moving

¹ See Order, p. 8.

Utah Public Service Commission

March 7, 2019

Page 2

Parties work with the other interested parties in this docket to revise this date to be one that is mutually agreeable to all parties involved.

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 "S".

Joelle Steward

Vice President, Regulation

CC: Service List - Docket No. 17-035-61

CERTIFICATE OF SERVICE

I hereby certify that on March 7, 2019, a true and correct copy of Rocky Mountain Power's **Comments on Joint Reply to the Public Service Commission's January 25, 2019 Order** 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 (C)	sfmecham@gmail.com
Vote Solar	
Rick Gilliam (C) Briana Kobar (C)	rick@votesolar.org briana@votesolar.org
Utah Clean Energy	
Sarah Wright Kate Bowman Hunter Holman (C)	sarah@utahcleanenergy.org kate@utahcleanenergy.org hunter@utahcleanenergy.org
Utah Solar Energy Association	
Amanda Smith Engels J. Tejada 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	
Sophie Hayes (C) Nancy Kelly (C) Callie Hood	sophie.hayes@westernresources.org nkelly@westernresources.org callie.hood@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



 Jennifer Angell
 Supervisor, Regulatory Operations