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

REBUTTAL TESTIMONY OF RYAN EVANS

ON BEHALF OF

UTAH SOLAR ENERGY ASSOCIATION

DATED this 15th day of July, 2020
/s/ Ryan Evans
Ryan Evans
President
Utah Solar Energy Association

Q. Please state your name and business address.

A. My name is Ryan Evans. My business address is 11509 Black Forest Drive, Sandy, Utah 84094.

Q. For whom are you testifying in this proceeding?

A. Utah Solar Energy Association (USEA)

Q. Did you previously file testimony in this proceeding?

A. Yes. I testified in an earlier phase of this proceeding in March of 2020.

Q. What is the purpose of your rebuttal testimony?

A. The purpose of my testimony is to respond to the testimony presented by Rocky Mountain Power, (***RMP***), Vote Solar, and Utah Clean Energy (UCE).

REBUTTAL OF CAROLYN BERRY FOR VOTE SOLAR

Q. Do you support the conclusions of Carolyn Berry of Vote Solar in regard to the value of exported energy in RMP's service territory?

A. Yes, after analyzing all that Vote Solar put forward in direct testimony, we support their conclusions and assessment of a $0.226/kWh value. USEA recognizes that certain tangible and intangible benefits of distributed generation solar energy should be factored into a final export value and Vote Solar has produced the most evidence for a higher than retail value.

Q. Do you agree with Ms. Berry that one of the most important lessons of the Transition Program is that rate uncertainty has had a substantial negative impact on rooftop solar?

A. Yes, as USEA presented in direct testimony of this phase of docket 17-035-61, we have seen a significant decline in solar installations over the course of the Transition Period. Uncertainty along with the complexity of the Transition Program's rate structure caused rooftop solar to decline and to be a more difficult sales process with prospective customers. Therefore a simple to understand rate structure that is not subject to change on a regular basis will help ensure that customers have a good understanding of their investment.

REBUTTAL OF KATE BOWMAN FOR RMP

Q. Do you agree with Kate Bowman's assessment of other factors that will influence rooftop solar adoption going forward?

A. Yes, each of the factors Ms. Bowman laid out is valid and will be an influence on cost and return on investment for future customers.

Q. Do you agree with Ms. Bowman that the principle of gradualism is important in avoiding adverse impacts?

A. Yes, I believe Ms. Bowman's direct testimony regarding gradualism is well thought out and important to consider. There may be parties involved in this docket that say the last few years can serve as a gradual shift to a new exported energy rate structure, but no one yet knows what this future rate structure will look like. Therefore it will take time for customers to understand a new program and for solar companies to develop materials to help inform prospective customers.

Furthermore, if the Commission accepts RMP's analysis of costs, the Commission should consider a glide path to a new exported energy rate structure that will preserve jobs and

capital investment in Utah. By this I mean that if we move to rapidly to a new rate structure that values exported energy significantly less than the transition period rate, it will certainly cause even greater job loss than we have already experienced, as estimated in USEA's direct testimony in this phase of the Docket 17-035-61. Additionally, Utah has already experienced a significant increase in unemployment due to the COVID-19 pandemic and a quick shift to a decreased value of exported energy will only add to the challenges we face already. This should be a significant external factor to consider in this decision for the Commission.

I also believe that should the Commission approve a decreased value of exported energy; we should use the caps set out as agreed upon by all parties of the NEM Stipulation as the points at which our rates officially move from Transition Program rates to a new rate structure. Parties identified 170 MW for residential distributed energy and 70 MW of commercial distributed energy as cap limits of acceptability to our electrical system and at this time we have not come close to reaching those caps. Utilizing those agreed upon caps would provide a very clear glide path and predictable point at which a new solar rate structure would be put in place.

REBUTTAL OF JOELLE STEWARD FOR RMP

Q. Do you agree with Ms. Steward's claim that RMP supports renewable resources, including providing renewable resource service options to customers?

A. Yes and no. In my opinion, I believe that RMP does support renewable resources when they own and/or deploy renewable resources. However, they have demonstrated several examples of successfully stifling or limiting competition with little appreciation for the investments made by the private sector and entrepreneurism in driving down the installed cost of solar energy. Without the latter, RMP would not be in a position to cost effectively deploy renewable resources within their service territory.

Q. Can you elaborate on what you mean by actions that stifled or limited competition?

A. Yes in my opinion, and solely my opinion based upon what I have witnessed working within the solar industry for USEA there have been a few easily identified examples of RMP effectively stifling competition. In 2016 RMP filed a proposal that would have ended net metering, and have it replaced with a structure that would have effectively eliminated rooftop solar in Utah. This was not mere speculation but a direct analysis of that 2016 proposal with how similar it was to a then recent NV Energy distributed generation rate structure change that effectively eliminated thousands of solar jobs in the state. Additionally, RMP successfully passed HB 261 (2018 General Session) through the Utah Legislature which, essentially, gave RMP the ability to own solar resources above 2 MW and therefore directly compete with private sector, utility and large-scale solar developers. As RMP worked with cities to pass HB 411 (2019 General Session), RMP insisted on a key provision that RMP be able to own resources developed to meet the needs of Utah municipalities, a measure which reduced much of the competitive market for RFPs.

While RMP had their reasoning for each of the above, it also served to drain the resources of their competition. USEA along with our member companies and other solar

advocates have tried to keep up but our resources have been depleted over time trying to protect the free market system that has produced thousands of solar jobs and hundreds of millions of dollars in capital investment in this state, yet it is an effort that seems to always be an uphill challenge. Again, this is solely my opinion and not meant to be an assumption of RMP's motivations.

Q. Does this conclude your testimony?

A. Yes, it does.

Certification:

Pursuant to Utah Code Ann. § 78B-5-705, I declare under criminal penalty of the State of Utah that the foregoing is true and correct to the best of my knowledge.
Executed on July 15, 2020

By: */s/ Ryan Evans* _____

Ryan Evans