



1014 East Second Avenue  
Salt Lake City, UT 84105  
(801) 363-4046

August 18, 2020

VIA EMAIL

UTAH PUBLIC SERVICE COMMISSION  
Heber M. Wells Building  
160 East 300 South, 4<sup>th</sup> Floor  
Salt Lake City, Utah 84111

**Re: In the Matter of the Application of Rocky Mountain Power to Establish Export Credits for Customer Generated Electricity**

Utah Clean Energy Comments Regarding Opening Statements and Witness Summaries

Dear Commissioners,

On August 14, 2020 Vote Solar provided a written request that parties be permitted to make brief opening statements and that witnesses be permitted to provide summary statements of their testimony before they are cross examined. On August 17, the Division of Public Utilities filed comments stating that they are not opposed to the provision of opening statements, but recommended that both opening statements and witness summary statements are limited to no longer than five minutes each. On the same date Vivint Solar filed comments supporting the request for opening statements and opposing the Division's request to limit statements to five minutes. The Office of Consumer Services and Rocky Mountain Power filed comments on this issue on August 18, 2020,

Utah Clean Energy supports allowing parties the opportunity to provide an opening statement. This is a particularly complex and substantial case, and brief opening statements from parties could provide a helpful basis for the hearing. UCE does not oppose the Division's request to create a time limit for opening statements, however, we recommend that opening statements of

ten to fifteen minutes be allowed in order to strike a reasonable balance between brevity and timeliness of the proceeding.

UCE also supports allowing witnesses to provide summaries of their testimony at the hearing, but we oppose instituting a time limitation on the summary of witness testimony. Given the voluminous information provided by witnesses in this case, an arbitrary time limit on witness summary statements may disadvantage parties who have provided lengthier and more substantial testimony. Further, witness summary statements are generally intended to provide a succinct introduction to testimony, which may be more comprehensible and accessible to members of the public who are not subject matter experts. A time limit that curtails the evidence provided in summary statements could, therefore, inhibit public understanding of and participation in this proceeding. Finally, in Utah Clean Energy's experience, it would be deviation from common practice to place time limitations on a witness' testimony summary. Commissioners already have the authority to request that a party expedite their summary if it is running long. For all the reasons stated above, this additional precaution seems unnecessary.

Utah Clean Energy supports allowing parties to provide opening statements. We do not believe it is in the public interest to introduce a limit on the time available to a witness to provide a summary of their testimony.

*Kate Bowman*

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Kate Bowman  
Renewable Energy Program Manager  
Utah Clean Energy

**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 18<sup>th</sup> day of August 2020, on the following:

**ROCKY MOUNTAIN POWER**

Jana Saba jana.saba@pacificorp.com  
Utah dockets utahdockets@pacificorp.com  
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  
DPU Data Request dpudatarequest@utah.gov

**OFFICE OF CONSUMER SERVICES**

Michele Beck mbeck@utah.gov  
Cheryl Murray cmurray@utah.gov  
Robert Moore rmoore@agutah.gov  
Victor Copeland vcopeland@agutah.gov  
Alex Ware aware@utah.gov

**UTAH SOLAR ENERGY ASSOCIATION**

Amanda Smith asmith@hollandhart.com  
Engels J. Tejada ejtejeda@hollandhart.com  
Chelsea J. Davis [cjdavis@hollandhart.com](mailto:cjdavis@hollandhart.com)  
Ryan Evans revans@utsolar.org

**SALT LAKE CITY CORPORATION**

Megan DePaulis megan.depaulis@slcgov.com

**UTAH CLEAN ENERGY**

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

VIVINT SOLAR

Stephen F. Mecham

Christopher Worley

sfmecham@cnmlaw.com

Christopher.worley@vivintsolar.com

AURIC SOLAR

Elias Bishop

elias.bishop@auricsolar.com

VOTE SOLAR

Sachu Constantine

Jennifer M. Selendy

Joshua S. Margolin

sachu@votesolar.org

jselendy@selendygay.com

jmargolin@selendygay.com

WESTERN RESOURCE ADVOCATES

Sophie Hayes

Nancy Kelly

Steven S. Michel

sophie.hayes@westernresources.org

nkelly@westernresources.org

smichel@westernresources.org

*/s/ Kate Bowman*

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