

PUBLIC SERVICE COMMISSION OF UTAH

Docket No. 17-035-61

CLOSING ARGUMENTS October 06, 2020

ADVANCED REPORTING SOLUTIONS

801-746-5080 | office@advancedrep.com | advancedrep.com

SALT LAKE | 159 West Broadway, Broadway Lofts, Suite 100 | Salt Lake City, Utah 84101

PROVO | 3507 North University Avenue, Suite 350-D | Provo, Utah 84604

ST. GEORGE | 20 North Main Street, Suite 301 | St. George, Utah 84770



Closing Arguments
October 06, 2020

1 BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

2 --oo0oo--

3)

4)

)Docket No. 17-035-61

)

In re: Application of Rocky)
Mountain Power to Establish)
Export Credits for Customer)
Generated Electricity.)

8

9

CLOSING ARGUMENTS

10

11

Taken on Tuesday, October 6, 2020

12

at 1:00 P.M.

13

14

Taken through The Public Service Commission of Utah
via Google Meet

15

160 East 300 South

16

4th Floor

17

Salt Lake City, Utah 84111

18

19

20

21

22

Reported by: Kellie Peterson, RPR, CSR

23

24

25

A P P E A R A N C E S

1
2 THE PUBLIC SERVICE Chair Commissioner Thad LeVar
COMMISSION: Commissioner Ronald Allen
3 Commissioner David R. Clark

4 FOR ROCKY MOUNTAIN Emily Wegener, Esq.
POWER: ROCKY MOUNTAIN POWER
5 1407 West North Temple
Suite 320
6 Salt Lake City, Utah 84116
Telephone: (801)220-4050
7 emily.wegener@pacificorp.com

8 FOR DIVISION OF PUBLIC Justin Jetter, Esq.
UTILITIES: UTAH ATTORNEY GENERAL'S OFFICE
9 DIVISION OF PUBLIC UTILITIES
160 East 300 South
10 Fifth Floor
Salt Lake City, UT 84114
11 Telephone: (801)366-0380
jjetter@agutah.gov

12 FOR OFFICE OF CONSUMER Steven W. Snarr, Esq.
13 SERVICES: UTAH ATTORNEY GENERAL'S OFFICE
OFFICE OF CONSUMER SERVICES
14 160 East 300 South
Fifth Floor
15 Salt Lake City, UT 84114
Telephone: (801)366-0380
16 stevensnarr@agutah.gov

17 FOR VIVINT SOLAR: Stephen F. Mecham, Esq.
STEPHEN F MECHAM LAW
18 10 West 100 South
Suite 323
19 Salt Lake City, Utah 84101
Telephone: (385)222-1618
20 sfmecham@gmail.com

21 FOR VOTE SOLAR: Joshua S. Margolin, Esq,
SELENDY & GAY
22 1290 Avenue of the Americas
New York, NY 10104
23 Telephone: (212)390-9000
jmargolin@selendygay.com
24
25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

FOR UTAH CLEAN ENERGY: Hunter Holman, Esq.
UTAH CLEAN ENERGY
1014 2nd Avenue
Salt Lake City, UT 84103
Telephone: (801)363-4046
hunter@utahcleanenergy.org

ALSO APPEARING: Ryan Evans
Christopher Thomas
Michael Milligan
Bob Davis
Debbie Kakanas

I N D E X

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

CLOSING ARGUMENTS:	PAGE NO.
Emily Wegener	5
Justin Jetter	21
Steven Snarr	30
Joshua Margolin	41
Hunter Holman	64
Stephen Mecham	69

1 October 6, 2020 1:00 P.M.

P R O C E E D I N G S

2

3 COMMISSIONER LEVAR: Good afternoon. Welcome
4 back, everyone. It is Tuesday, October 6, 2020, and we
5 are here for the closing arguments in Public Service
6 Commission Docket 17-035-61, application of Rocky
7 Mountain Power to establish export credits for customer
8 generated electricity.

9 Does anyone have anything that needs to be
10 brought to our attention before we begin closing
11 arguments? I see that both -- the other two
12 Commissioners are on the -- are on the conference, and
13 looks like -- I haven't done an inventory to make sure
14 everyone we need is on, but it looks, generally, like we
15 have those who will be presenting closing arguments.

16 Anything preliminary before we begin? Okay.
17 I think we will just go to Rocky Mountain Power first,
18 then. Ms. Wegener, if you want to go ahead and provide
19 your closing statements.

20 EMILY WEGENER: Yes, thank you. Good
21 afternoon, Chair LeVar, Commissioner Clark and
22 Commissioner Allen.

23 Thank you for the opportunity, over the past
24 week, to present Rocky Mountain Power's evidence
25 concerning the appropriate export credit rate for

1 customer generators. The Company's goal with this
2 application is to create a fair and durable solution that
3 appropriately compensates customers who choose to become
4 generators for the benefits they provide the grid, while
5 leaving other non-customer generators indifferent to the
6 source of their energy.

7 At the outset, I think it is important for
8 the Commission and members of the public to remember that
9 the cost of energy flows directly back to customers
10 through the Company's energy balancing account, which is
11 trued-up annually to align with the actual cost the
12 Company pays for energy.

13 If the Company must pay 24 cents per kilowatt
14 hours for customer generators, as proposed by Vote Solar,
15 but could have otherwise procured energy for 2 cents per
16 kilowatt hour, it is customers that bear that cost. This
17 makes determining the just compensation rate vital, not
18 only to customers who choose to install rooftop solar but
19 to all customers.

20 At this hearing, we have heard about some of
21 the benefits that customer generators purportedly provide
22 to the community, but many of these benefits are not
23 relevant to the -- to value exported -- to the value
24 exported energy provides to the system.

25 Important discussions about the expense to

1 which rooftop solar -- the rooftop solar industry has a
2 positive impact on the economy in our state and whether
3 customer generators should receive some sort of
4 compensation beyond the value of the energy they produce
5 and any quantifiable benefit to the grid are important
6 discussions, but those discussions should be held in a
7 different forum than this one.

8 The scope of this proceeding is limited to
9 determining the value of exported energy. It is the
10 result of the win-win-win solution reached by most of the
11 parties to this docket, memorialized in the stipulation
12 approved by the Commission in its September 29, 2017
13 order.

14 That order taps participation in the
15 Company's net metering program, but continued the program
16 through 2035, put in place the transition program through
17 2032, and stated that the Company would file an
18 application to open this docket.

19 Per the order of the stipulation and the
20 Company's application, this proceeding is to determine
21 the compensation rate for exported power from customer
22 generation system for all customers, including after the
23 expiration of the grandfathering period and transition
24 period.

25 I think it is very important to keep a narrow

1 scope of this proceeding as a touchstone as the
2 Commission is -- is showing a ruling. The Commission
3 should not revisit its decision to cap net metering.
4 Vote Solar appears to misunderstand the scope of this
5 proceeding, as I just outlined it, as their primary
6 position, is that the Commission should make a
7 determination that the benefits of net metering of the
8 net metering program exceeds its cost, and therefore, the
9 net metering program should be reopened to new customers.
10 But the structure of the ongoing program for customer
11 generators was established by the settlement of the 114
12 docket.

13 Even if the Commission decided to revisit its
14 analysis under the net metering statute, Vote Solar's
15 proposal should be rejected because the Company has
16 demonstrated that the value of exported energy is far
17 less than the retail rate paid under net metering. And
18 the benefits that interveners propose to include in the
19 value of export are neither quantifiable nor based on the
20 Company's cost of service.

21 While net metering should not be reinstated,
22 the guidelines concerning how to interpret costs and
23 benefits are relevant from a policy perspective to how
24 the Commission should determine the export credit rate in
25 this proceeding.

1 Utah law and policy have continually affirmed
2 that rates charged by the utility must be based on its
3 cost of service, and, likewise, so should any export
4 credit rate.

5 In the 114 docket, July 1, 2015 order, this
6 Commission limited the analysis of costs and benefit
7 under the net metering program to those that non-customer
8 generators incur or receive in their capacity as
9 ratepayers. The Commission stated that this limit is
10 more consistent with the Commission's long-established
11 role, and therefore, more likely consistent with the
12 Legislature's intent.

13 The Commission also held that only
14 quantifiable costs and benefits to be included in any
15 analysis of costs and benefits of the net metering
16 program.

17 Since this order, the Legislature has
18 confirmed the Commission's understanding when it enacted
19 the Community Renewable act, HB-411, which I discussed
20 briefly with Utah Solar Energy Association witness Ryan
21 Evans.

22 He asks -- states that, "Rates for a
23 community renewable program shall take into account any
24 quantifiable benefit to the Company and customers in
25 their capacity as ratepayers, excluding costs or benefits

1 that do not directly affect the cost of service." It
2 seems to take a page directly out of the Commission's
3 earlier order.

4 Based on this language, it appears the
5 Legislature agrees with the Commission's earlier
6 interpretation of what costs and benefits should be
7 included. That means that in this proceeding, the
8 Commission can easily remove components of the
9 interveners' proposals that are not cost-based. There is
10 no evidence that the Company currently incurs a carbon
11 compliance cost or any other specific costs associated
12 with reduced carbon emissions.

13 Again, carbon emissions are an important
14 policy consideration but this is not the forum to take
15 them into account. There's no evidence that the Company
16 incurs any cost related to the economic benefits that the
17 solar industry could provide to Utah, and Mr. Evans
18 admits that the utilities low rates are actually an
19 economic driver in Utah.

20 The Company does not deny that the economy is
21 something of vital interest to the state, but economic
22 incentives are not within the purview of the Commission
23 and should not influence the export credit rates. Just
24 as the Commission could not approve an imprudently
25 incurred cost to retain unneeded meter readers, it cannot

1 approve a component of an export credit rate designed to
2 bolster solar jobs.

3 The payback period for the installation of
4 solar panels is similarly irrelevant to the determination
5 of what the value of exported energy is to the grid. As
6 Dr. Worley admitted in his testimony, the value of a
7 kilowatt hour does not change based on what a customer
8 pays to install their system. Therefore, what a customer
9 pays is not an appropriate consideration for
10 dis-remitting an export credit rate.

11 This is another example of a consideration
12 that may be important on a policy level for determining
13 whether the state wants to incentivize a customer's
14 choice to install rooftop solar, but not an appropriate
15 consideration by the Commission determining cost based
16 rate for customers. Similarly, the value the Company
17 system could receive from new technology in the future,
18 but is not yet in place, is outside the scope of this
19 proceeding.

20 I now want to turn to the specific components
21 of the export credit rates. All parties agree that the
22 Company benefits from customer generation in the form of
23 avoided energy costs. The Company has proposed two
24 different methods for calculating the value of avoided
25 energy costs.

1 The first is based on the Commission's -- on
2 the Commission-approved methodology for forecasting
3 qualifying facilities' avoided costs and then applied to
4 the historic export level of customer generators. The
5 second is based entirely on historical EIM prices and
6 also applied to the historic export level.

7 While the Company believes the avoided cost
8 model is the most accurate, it also understands that
9 historical EIM prices may be simpler to explain to
10 customers. And while historical EIM prices would have
11 some lag, the Company is less concerned with lag, so long
12 as the Commission allows it to update the export credit
13 rate frequently.

14 OCS has proposed a modification to the
15 avoided cost methodology advocating that market caps be
16 removed from the grid model during high-load hours. The
17 Company disagrees with this proposal in both this docket
18 and in its pending rate case.

19 The advantage of the Company's proposal to
20 use the Commission-approved methodologies for avoided
21 costs is that there is already an established process for
22 the Commission to review proposed changes, like this
23 change proposed by OCS in a proceeding that has already
24 been established.

25 The Commission should accept on and off peak

1 rates because differentiated rates more accurately
2 reflect the value of exported energy to the system and
3 will encourage economically efficient customer behavior.

4 Dr. Milligan's proposal to use the Company's
5 official forward price curve to determine the value of a
6 voided energy is flawed. The Company does not use the
7 OFPC alone to determine what to pay for energy. It is a
8 less reliable method for determining what the value of
9 energy will be in the year ahead than the methods
10 proposed by the Company.

11 Forward market prices reflect a premium for
12 price and volume certainty that is inconsistent with the
13 volumes that might or might not be exported by customer
14 generators during any future period.

15 As stated in Mr. MacNeil's testimony, the
16 Company's future resourcement could also affect the value
17 of export, which would not be accounted for in
18 Dr. Milligan's proposed method.

19 The load research study discussions in this
20 proceeding were a red herring. The Commission should not
21 require the Company to use a load research sample to
22 determine the export profile used to develop the export
23 credit rates, because the Company's method of using the
24 entire population as Schedule 136 customers is more
25 accurate, relevant and straightforward.

1 As Dr. Lee testified, the results of the
2 census that RMP conducted were very close to the results
3 of his load research study. Given that the two methods
4 produced similar results and the census method is much
5 simpler, in that it does not require any regression
6 analysis to arrive at a valid result, the Commission
7 should adopt the Company's method of analyzing all export
8 data to determine the export credit -- the export
9 profile.

10 And now turning to line losses, all parties
11 agree that the Company benefits from customer generation
12 by reduced land losses. Based on input from other
13 parties during this proceeding, the Company has increased
14 the value that it ascribed to avoided line losses. It
15 appears Dr. Volkmann agrees with the Company's revised
16 proposal.

17 The Commission should also include a
18 component in the export credit rates that takes into
19 account integration cost. Customer generator exports are
20 uncertain and will vary through time, which justifies
21 including integration costs in the export credit rate.

22 Turning to avoided capacity benefits, avoided
23 capacity benefits, including avoided generation,
24 transmission and distribution, should not be included in
25 the export credit rate at all. A customer's generation

1 is prioritized for their own use, and the Company only
2 received the leftovers.

3 Similar to a partial requirements customer
4 that serves its own load requirements first and does not
5 commit to making any deliveries, customer generators
6 should not receive compensation for capacity.

7 Dr. Milligan's capacity calculation uses the
8 top 10 percent of Utah load hours to reach a 27.65
9 percent capacity contribution. The use of forecasted
10 load and historical customer generation exports does not
11 properly account for the relationship between customer
12 generation and consumption.

13 If the Commission does not include a benefit
14 for -- excuse me, if the Commission does include a
15 benefit for capacity contribution, it should not use this
16 oversimplified calculation. Further, Dr. Milligan's
17 proposed capacity contribution is inappropriate to apply
18 to generation transmission or distribution capacity,
19 regardless of which type of capacity is at issue.

20 Mr. MacNeil effectively rebutted Dr. Milligan
21 by explaining the effects of contracted solar capacity
22 which reduces the capacity contribution of customer
23 generation to, at most, 4.6 percent. Dr. Milligan
24 admitted that he did not account for any utility scale
25 solar in his capacity contribution calculation.

1 With respect to the cost of capacity, the
2 Commission has establish that the PDDRR method
3 incorporates the lost benefit of capacity resources.
4 Interveners also failed to account for this.

5 The Commission should also reject avoided
6 transmission and distribution capital investments. The
7 Company does not propose any reduction to the export
8 credit rates due to increased wear and tear because it
9 cannot quantify that wear and tear.

10 Likewise, the Commission should reject
11 referred capital investment costs because they are not
12 quantifiable. Dr. Volkmann admitted that he could not
13 quantify what level of rooftop solar penetration would
14 result in deferred capital investments. His supporting
15 example of a deferred investment comes from California,
16 relates to customer generation as a whole, rather than
17 solely to export, and would likely not be applicable to a
18 different solar profile and different level of
19 penetration in the Utah market.

20 As explained by Mr. Barker, the Company does
21 not expect any deferred capital investment in the
22 foreseeable future attributable to customer generation
23 export.

24 Avoided hedging costs are also not
25 appropriate to include in the export credit rates. As

1 admitted by Dr. Berry, hedging reflects the difference in
2 value between a forward price and stop price. Using the
3 OFPC as proposed by Dr. Milligan would already use a
4 forward price and takes into account hedging benefits.
5 Forward prices are also based into the Company's grid
6 model.

7 The export credit rate should be updated
8 annually because an annual update most fairly compensates
9 customer generators. If the value of their generation
10 goes up, they will get the benefit. If it goes down,
11 other customers will not be forced to pay an inflated
12 price for electricity over a long term as a result.

13 This is consistent with how the Company
14 treats qualifying facilities that do not commit to
15 specific delivery. The evidence also established that no
16 netting is a fair, easy way to determine the value of
17 exported energy. Compared to an hourly or 15 minute
18 netting, there is no dramatic impact on the incentive to
19 customer generators with respect to usage.

20 The Commission should also accept the
21 application fee proposed by the Company because it is
22 cost based and consistent with the methodology used in
23 the transition program. And the Commission should allow
24 for a metering fee, both now and in the event AMI is
25 implemented.

1 The Company's proposal is not the entire cost
2 of a new AMI meter. Rather, the fee is a weighted cost
3 of a new meter and the cost to reprogram. The fee is not
4 discriminatory. The Company similarly charges AMR
5 opt-out customers for the costs they create due to their
6 choice to elect an option not covered by basic service.

7 The Company has proposed moving forward with
8 AMI in its pending rate case. However, this proposal
9 does not include upgrading every meter on the Company's
10 system. Rather, it includes enough meters to create a
11 mesh network, which supplies benefits to all Utah
12 customers.

13 There is no guarantee that any particular
14 customer generator would have an AMI meter once the AMI
15 program is implemented, so a weighted cost is reasonable.
16 Of course, the amount of the metering fee could be
17 re-evaluated if AMI is implemented.

18 This hearing included significant discussion
19 about incentive. As I mentioned at the beginning of my
20 statement, most incentives or subsidies are outside the
21 scope of this proceeding. Mr. Constantine, Ms. Bowman
22 and Dr. Berry all agreed that aligning usage with
23 renewable output is a laudable goal.

24 The Company's proposed rate provides this
25 incentive to customer generators. Under any of the

1 schedules applicable to customer generators, 135, 136, or
2 the proposed Schedule 137, a customer generator offsets
3 their full retail rate for any production they consume.
4 The company's proposal is also consistent with public
5 policy as set forth in the net metering statute, which
6 defines a customer generation system as one that is
7 intended to primarily offset part or all of the
8 customer's requirement for electricity.

9 This incentive is in place, while also
10 leaving non-net metering customers indifferent, meaning
11 they are no better off but also no worse off than they
12 would be absent customer generator.

13 The Company and parties have engaged in a lot
14 of work to get us to this point. Based on the evidence
15 presented in this hearing, the Company requests that the
16 Commission approve its application. Specifically, the
17 Commission should implement the new Schedule 137 and
18 approve the Company's proposed methodologies for
19 calculating the export credit rates that include avoided
20 energy costs, avoided line losses and integrated costs.

21 It should also approve the proposed
22 application and meter fees and close Schedule 136 to new
23 applications received after December 31, 2020.

24 In conclusion, net billing maintains Rocky
25 Mountain Power's ability to provide low-cost electric

1 service that is good for Utah and fair for all customers.

2 Thank you.

3 COMMISSIONER LEVAR: Thank you, Ms. Wagener.

4 I'll go to Commissioner Allen. Do you have
5 questions for Ms. Wegener?

6 COMMISSIONER ALLEN: No questions.

7 Did you get that? No questions. Thank you.

8 COMMISSIONER LEVAR: You are muted,
9 Commissioner.

10 COMMISSIONER ALLEN: I don't show muted here.
11 Can you hear me now?

12 COMMISSIONER CLARK: Commission Allen, I can
13 hear you. I think the other parties can hear you. I
14 wonder if we are dealing with --

15 COMMISSIONER LEVAR: Okay. I think I'm
16 having volume issues. I was hearing Ms. Wegener fine,
17 but I'm not hearing anyone else. When that happened last
18 night, I logged out and logged back in, so give me a
19 quick second and I will come back and see if my volume is
20 back. I apologize.

21 (A discussion was held off the record.)

22 COMMISSIONER ALLEN: Now you're muted.

23 COMMISSIONER LEVAR: There we go.

24 Do you have any question for Ms. Wegener?

25 Sorry.

1 COMMISSIONER ALLEN: No, I do not have any
2 questions.

3 And I am grateful you got to hear the sound
4 of my voice today, Chair, so...

5 COMMISSIONER LEVAR: I am grateful for that
6 too. I hadn't yet this morning.

7 Commissioner Clark, do you have any questions
8 for Ms. Wegener?

9 COMMISSIONER CLARK: Equally grateful.
10 I have no questions.

11 COMMISSIONER LEVAR: Okay. Thank you.

12 I don't have any either. Thank you for your
13 closing statements, Ms. Wegener.

14 And we will go to Mr. Jetter next.

15 MR. JETTER: Okay. Am I streaming? Can you
16 hear me, Mr. Chairman?

17 COMMISSIONER LEVAR: I can see and hear you.
18 Thank you.

19 MR. JETTER: Fantastic.

20 Good afternoon, Chairman LeVar and
21 Commissioners Clark and Allen, you have been given a very
22 difficult task to grapple with what a fair export credit
23 will be for customer generators. What value is just,
24 reasonable and in the public interest for the utility to
25 compensate customer generators for an exported kilowatt

1 hour is a complicated issue. Given that the utility is
2 legally entitled to the opportunity to recover its costs,
3 including the purchases of that exported energy, the
4 question then is really a matter of what value is just
5 and reasonable for other nonparticipating customers to,
6 ultimately, pay the utility for each kilowatt hour of
7 exported energy.

8 The narrowing of the issues to this core
9 question that is the purpose of this docket was the
10 result of a multiyear process, the prior investigative
11 docket, No. 14-035-114, and the ensuing settlement was
12 necessary at the time to end the unsustainable net
13 metering program and open a docket where customer
14 generated exports could be valued in a reasonable and
15 sustainable way that is fair to both the customers, who
16 are generating, and the customers who, ultimately, are
17 responsible for paying the cost of that generation.

18 The Division has remained true to its
19 commitment not to challenge the customer generations free
20 use of the grid services while consuming on-site energy,
21 and those hours were left at no cost in the Division's
22 analysis. And the Division has not argued in this
23 proceeding to reopen that question.

24 In its July 10, 2018 order on review, this
25 Commission made clear that, this is a quote, "The PSC is

1 conducting this proceeding to set the export credit rate,
2 subject to the terms of the stipulation, and must use the
3 best evidence practically available," end quote.

4 I think it's worth a few moments of our time
5 to address what the adoption of a settlement stipulation
6 means. It's been described in this docket as a private
7 agreement among private parties. And that's true, at
8 least, in some part.

9 The deciding private parties did agree to
10 support a settlement stipulation before this Commission.
11 However, this is a public service commission. It's not a
12 court. And the parties who sign the stipulation have no
13 authority to set rates or to limit the scope of a
14 Commission proceeding.

15 The stipulation on its own has no binding
16 effect on this Commission. Rather, a settlement
17 stipulation is, in effect, a consensus recommendation by
18 the parties supporting it. The Commission acted in its
19 legislative capacity when it adopts the settlement
20 stipulation as part of its administrative order. It did
21 that in Docket 14-035-114.

22 As such, once that settlement stipulation was
23 adopted by the Commission, it becomes part of the order
24 of this Commission. And this Commission further ordered
25 that this proceeding is for the purpose of setting an

1 export credit rate.

2 Vote Solar has suggested, however, that
3 because the Division did not separately address those
4 hours that CG customers rely on the grid without energy
5 purchases, that the Commission lacks evidence on the
6 record to determine that the cost of net metering would
7 exceed the benefits, or they, in fact, do exceed the
8 benefits.

9 However, there is no material difference
10 between net metering and an export credit rate that is
11 set at the same value level as a current residential
12 retail rate. This is simple mathematical quality. And
13 this, in fact, is the same mathematical equivalence that
14 is the basis for both Vote Solar and the others in this
15 docket who favor -- argue in favor of returning to a net
16 metering program.

17 And, similarly, the position of Utah Clean
18 Energy in Salt Lake City recommend exactly what is
19 described, setting an export rate equal to the retail
20 residential rate. The two are equivalent.

21 Testimony from the Division, Rocky Mountain
22 Power, and the Office of Consumer Services all provide
23 substantial evidence on the record that the value of an
24 exported kilowatt hour is less than the cost to provide a
25 bundled residential retail service kilowatt hour.

1 Therefore, there is ample evidence in the record of this
2 proceeding for the reasonable and factually supported
3 conclusion to be drawn from that evidence if the
4 Commission determines that it needs to make that decision
5 that the cost of net metering exceed the benefits.

6 The amount and timing of exports determine
7 the value of those exports. Before this Commission in
8 the record, there are three competing load research study
9 results sets. The Division admittedly improperly
10 calculated the strata weighting with respect to the load
11 research sample from the 135 customers.

12 And while you heard from Dr. Lee that this
13 resulted in an underestimation by significant amount in
14 one strata, and its contribution of total exports, which
15 you'll also find in your review of the record, is that
16 the sum of the weighted errors -- weighting errors,
17 excuse me, in all five of the strata results in an
18 overestimate of the total production by Mr. Davis, not an
19 underestimate.

20 Importantly, however, this issue has little
21 bearing on the outcome. The record shows that the
22 profile of the generation in each of the three competing
23 load research study examples are nearly
24 indistinguishable. Variations and timing and
25 non-generation that are likely to be exported by the new

1 Schedule 137 customers are similar regardless of the load
2 research study used in this Commission's final
3 determination.

4 The proposed export rate structure components
5 of this docket vary widely among the parties. You have
6 received expert testimony from multiple parties that
7 propose the use of a stacked valuation method. In
8 performing those calculations, the exported customer
9 generation kilowatt hours are then adjusted for a variety
10 of factors, such as line loss and capacity contributions,
11 capacity for generation transmission, distribution grids,
12 carbon compliance costs, fuel hedging, social costs of
13 carbon, and even values such as economic development
14 values of jobs of third parties.

15 You also heard witnesses of each party using
16 the stacked valuation walk through a comparison of the
17 their own values and methods, but instead, substituting a
18 utility scale solar facility. And when we perform that
19 type of a reference comparison with an alternative or
20 substitute generation, results are fairly clear. The
21 valuations proposed are simply not supportable when a
22 known substitute generation resources compared even using
23 their own models.

24 Dr. Worley's valuation stack, for example,
25 taking his values for capacity line loss and transmission

1 distribution savings at around 2 -- excuse me, at around
2 2.35 cents per kilowatt hour, in addition to the
3 commodity of energy delivered, as compared to the
4 substitution utilities scale solar PPA.

5 Similarly, Dr. Berry came to a calculation
6 using her method of 2.27 cents per kilowatt hour, as
7 compared to a utility scale solar PPA, excluding the
8 third-party or external economic benefits.

9 Even if we add those benefits of another 3.37
10 cents per kilowatt hour for economic externalities, the
11 total value would still only add 5.54 cents to what would
12 otherwise be acquired through a solar PPA.

13 What this demonstrates is that the stacked
14 valuation method is inaccurate in determining a fair
15 calculation of an avoided cost, and the reason for that
16 is if we have a known alternative that can provide all of
17 the same benefits for significantly less money, there is
18 no other conclusion to reach, other than that the full
19 stacked valuation method does not account for
20 substitutions that are known and available.

21 The Division continues to support the use of
22 the avoided cost method for valuing any resource acquired
23 through a noncompetitive process such as this.
24 Regulators are in the business generally of ensuring that
25 monopoly utilities operate in a prudent and least cost

1 restrict manner. Subject to that qualification,
2 regulators are in the business of allocating the actual
3 costs that a utility incurs fairly to the customers that
4 cause those costs.

5 Part of that function is ensuring that non-CG
6 customers are protected from overpaying or being
7 over-allocated costs for an energy commodity included in
8 their bundled rates that is higher than the market rate
9 or market value for that energy. The Division supports
10 the well-established, avoided proxy partial differential
11 displacement revenue requirement method for calculating
12 the avoided costs.

13 Applying the proxy PDDRR method to export
14 volumes and timing taken from any of the three load
15 research study results put forth in the record of this
16 docket results in a value that will hold nonparticipating
17 customers harmless.

18 The Division fully supports customer choice.
19 Rooftop solar and other customers that generate and have
20 storage devices can and will provide meaningful benefits
21 to the grid and to the customers who install them and
22 also to the utility and other customers.

23 You have heard a wide variety of public
24 customer from predominantly interested solar installers,
25 employees, rooftop solar customers, and their

1 representatives throughout the course of this docket.
2 What you didn't hear from clearly throughout this docket
3 was the single mother in Kearns who will be paying more
4 for her electric service to subsidize the cost of rooftop
5 solar if the export credit is higher than what she
6 otherwise would have paid or otherwise could pay to known
7 available alternatives, such as a wholesale or a utility
8 scale solar PPA.

9 She may not have lobbyists or a special
10 interest group to support keeping her rates low, but her
11 rates matter. And what you're -- while you're grappling
12 with this complex issue of setting a fair rate for export
13 credits, the Division asks that you consider all
14 customers, including the non-CG customers and what is a
15 fair rate for them.

16 The Division continues to recommend that the
17 Commission approve Rocky Mountain Power's proposed
18 Schedule 137 net billing proposal, and that that remain
19 subject to annual review so that true-ups can be made
20 over time, rather than conflicts, drawn out litigation
21 once every three or four years.

22 The Division recommends the Commission direct
23 Rocky Mountain Power to open a docket to study the
24 distributed generations costs and potential benefits to
25 the distribution system where evidence may not be

1 sufficient in the record in this case.

2 That concludes my closing statement. Thank
3 for you for your time, Commissioners.

4 COMMISSIONER LEVAR: Thank you, Mr. Jetter.
5 We appreciate your comments today. I will go to the
6 other two Commissioners, and I'll see if doing the exact
7 same thing I did before gets any different results this
8 time.

9 Commissioner Clark, do you have any questions
10 for Mr. Jetter?

11 COMMISSIONER CLARK: No questions. Thank
12 you.

13 COMMISSIONER LEVAR: Thank you, Commissioner
14 Clark.

15 Commissioner Allen, do you have any questions
16 for Mr. Jetter?

17 COMMISSIONER ALLEN: I have no questions.
18 Thank you.

19 COMMISSIONER LEVAR: Thank you.

20 And I don't either. Thank you for your
21 closing statements, Mr. Jetter.

22 And we will go to Mr. Snarr now.

23 MR. SNARR: Thank you. Good afternoon,
24 Commissioner.

25 It's OCS's intent today to help the

1 Commissioners focus on the issues and find a path through
2 this interesting record and to find a way to resolve the
3 docket consistent with the legal requirements that would
4 apply.

5 So I'm going to take you on a little tour of
6 those issues and try to walk through this in a way that
7 makes some sense, that might allow you to find your way
8 to an appropriate resolution.

9 This proceeding has its roots in the earlier
10 Commission net metering docket, the Commission there
11 reacting to a legislative directive to explore the costs
12 and benefits of net metering provided the following
13 guidance to the parties as to the nature and scope of the
14 Commission's inquiry.

15 The Commission's order issued on July 1,
16 2015, in Docket No. 14-035-114, states that "As a matter
17 of law, we conclude Subsection 1 requires the Commission
18 to consider costs and benefits that accrue to the utility
19 or its non-net metering customers in their capacity of
20 ratepayers of the utility.

21 "It necessarily follows that any cost or
22 benefit to be included in the Subsection 1 analysis must
23 be a cost or benefit that has some impact on the
24 utility's costs to service."

25 Further, the Commission in an order issued on

1 November 10, 2015, offered this additional clarification.
2 "The category of costs should generally be consistent
3 with those PacifiCorp employs in preparing costs of
4 service studies for ratemaking purposes. To the extent
5 any party believes a cost impact of net metering should
6 be included in one of the studies or used to supplement
7 the result of a study, the party bears the burden to
8 demonstrate the existence of the impact and the would-be
9 or has-been realized in the test period."

10 Parties to the Docket No. 1 -- No. 14-035-114
11 proceeding negotiated a settlement stipulation and
12 submitted it to the Commission. After reviewing the
13 settlement stipulation, the Commission approved the
14 agreement.

15 Important aspects of the settlement
16 stipulation were the following: Existing net metering
17 customers would be grandfathered into the continued
18 application of the existing net metering rate provisions
19 until December 31, 2035.

20 Transition customers, those applying for net
21 metering after November 15, 2017, up until the issuance
22 of an order in this proceeding, would be grandfathered
23 into a net metering rate provision that would generally
24 be 90 percent of existing residential rates through
25 December 31, 2032.

1 Also a new docket, this docket, would be
2 established to determine a cost based export credit rate
3 to apply to exported energy in the future. Consistent
4 with this background, we must not forget the state of net
5 metering as this docket -- this docket was open.

6 Existing net metering customers would be
7 protected from any major change in their net metering
8 rates for a time frame that would substantially meet
9 their contractual commitments to construct solar panels
10 on their home. Gradualism or glide path concerns are not
11 really applicable to this group.

12 Transition customers who are provided with
13 advanced notice as to the nature of the net metering rate
14 and the term of years such rate would apply prior to such
15 customers entering into any net metering or energy export
16 agreements.

17 While the 15-year term of rate arrangements
18 for this group is shorter than the net metering
19 customers, it provides for certainty and allows this
20 customer group to adequately analyze the economics
21 related to the decisions they might make as it relates to
22 constructing solar panels on their home.

23 Similarly, gradualism and glide path concerns
24 should not be an issue for this group of solar generators
25 who have a firm, set deal for 15 years. With respect to

1 future homeowners who may want to engage in customer
2 generation and export excess energy back to the utility,
3 this docket was initiated in order for this Commission to
4 complete its inquiry into what costs and benefits might
5 be associated with exported solar energy and to
6 determine, using its traditional power and authority to
7 establish just and reasonable rates based on a regulated
8 utility's cost of service, what a cost based export
9 rate -- credit rate might be.

10 In this regard, the OCS submits that
11 cross-subsidies from non-customer generators to customer
12 generators should be minimized, and that a true cost
13 based rate should be used that leads to fair compensation
14 to the solar customer generator for the value of excess
15 exported energy.

16 Some of the issues raised by parties in this
17 proceeding clearly fall outside the scope of this
18 Commission's authority to consider. They include a
19 number of issues, and I will enumerate some of them.
20 Externalities that fall outside of those things that
21 might be recognized in Rocky Mountain's cost of service,
22 such as health benefits from reduced air pollution,
23 benefits of reduced carbon emissions associated with
24 solar energy, avoided fuel -- fossil fuel lifecycle
25 costs, and local economic benefits are just simply

1 outside the purview of anything this Commission needs to
2 worry about when setting just and reasonable rates based
3 upon a specific cost of service for the regulated
4 utility.

5 There's another factor that exists for which
6 the Commission has no responsibility. It's like an
7 elephant in the room. That is the expiration of federal
8 and state tax credits for rooftop solar installations.
9 While these tax credits have jump-started the solar
10 energy industry, created jobs for the solar energy
11 sector, and provided economic benefits to those Rocky
12 Mountain Power customers who made decisions to install
13 rooftop solar panels, the expiration of such credits is,
14 perhaps, the most significant factor that might affect
15 the future of the solar energy industry.

16 And this is a factor that the Commission has
17 no authority to reverse nor any responsibility to
18 rectify. This Commission regulates utilities and sees
19 that its customers are treated fairly. It has no
20 regulatory responsibility for the unregulated solar
21 energy industry. None of the solar advocates seem to
22 acknowledge the relative impact of these tax credits that
23 are going away.

24 Now, as to the issues that might be
25 considered by this Commission, the Office would like to

1 provide its assessment as to how those issues might be
2 resolved. A load research study should be used to make
3 an annual assessment to determine the extent to which
4 costs or benefits in order to the benefit of Rocky
5 Mountain Power's cost of service when energy in excess of
6 a generating customer's own use is delivered back to RMP.

7 Load research studies were prepared by RMP
8 and Vote Solar. OCS reviewed both studies and found the
9 difference in the profiles was small. OCS is confident
10 that the Commission will be able to apply the inputs
11 derived from either study to the energy credit rate.

12 The OCS submits that updating cost inputs
13 needs to be done on an annual basis in order to capture
14 the latest changes in both costs and benefits that might
15 affect the determination of a just and reasonable export
16 credit rate for customer generators.

17 In making the necessary assessments of costs
18 and benefits, the Commission should recognize the
19 following: Avoided energy costs, this can best be
20 determined using recent historic energy imbalance market
21 or EIM data. While the OCS initially supported Rocky
22 Mountain Power's use of grid developed avoided energy
23 costs, it has agreed to use EIM data as initially
24 suggested by Vivint's witness, Mr. Worley. EIM data is
25 more transparent and will minimize controversies.

1 With respect to line losses, the OCS
2 supported Vote Solar's proposal, which included secondary
3 transformers losses. Integration costs should be
4 included as a reduction to avoided costs. OCS's witness,
5 Mr. Hayet, supported this recommendation because customer
6 generated excess energy is an intermittent resource. He
7 suggests the use of .015 cents as an integration cost.

8 Although Mr. Hayet's avoided energy costs,
9 plus line losses -- excuse me, all together, Mr. Hayet's
10 avoided energy cost, plus line losses and integration
11 costs, amount to 2.25 cents per kilowatt hour. The OCS
12 also supports recognition of avoided generation capacity
13 costs. However, the extent to which generation costs
14 should be included must be carefully scrutinized and not
15 overstated.

16 In addition to the fact that solar energy is
17 intermittent, there are risks with solar export capacity,
18 in that the amount of capacity that can be exported can
19 be reduced unexpectedly if customers increase their
20 household use of energy.

21 For these reasons and because there are no
22 contractual commitments to rely upon, like other energy
23 sources, the OCS has taken the position that 50 percent
24 of the average avoided generation values calculated by
25 Vivint and Vote Solar should be recognized. That

1 calculation results in a 1.41 cent adder to the
2 calculated energy credit rate.

3 Now based on these assumption, the OCS
4 recommends a fair, just and reasonable rate of 3.7 cents
5 to be applied to exported energy when it is delivered
6 back to RMP from customer generators. Specifics on how
7 each element of this rate is calculated is fully
8 explained in Mr. Hayet's hearing testimony.

9 I would like to -- I'd also like to address a
10 number of other issues that have been raised in this
11 proceeding. As to each of these issues, there is a
12 failure in satisfying the burden of proof necessary for
13 the suggested cost to be included at this time in an
14 exported credit rate.

15 First, hedging costs: There was no
16 demonstration on how crediting customer generation might
17 actually lower hedging costs. In the context of the
18 hedging program that has been approved by this PSC.
19 RMP's hedging program involves specific contracts.
20 Customer generation is not governed by similar contracts.

21 CO2 compliance cost: There was no
22 demonstration as to the existence of any current CO2
23 compliance costs. If and when actual CO2 costs are
24 imposed, the export credit rate could be updated to
25 include these costs.

1 Avoided transmission and distribution costs:
2 There was a failure of any clear proof that the existence
3 of customer generation displaced the need for RMP
4 investment in transmission or distribution system costs.
5 Transmission facilities are still needed to connect the
6 utility system with other systems and to traditional
7 generation facilities.

8 And as a post-generation capacity, if
9 customer export energy does not materialize as
10 anticipated, PacifiCorp cannot just go out to the market
11 to acquire additional transmission capacity as needed.
12 Furthermore, suggestions made by other parties that
13 transmission costs be the equivalent to a fully loaded
14 tariff rate are clearly out of the question.

15 The distribution system must still exist to
16 provide direct service to customer generators when their
17 solar energy is not available and to redeliver their
18 exported energy to other users when customer generators
19 are delivering energy back to RMP.

20 Now I would like to comment on just a few
21 other issues, and we may have covered the waterfront.
22 RMP's solar generation application fee has been
23 questioned. As noted by Michelle Beck in her testimony,
24 "Any such application fee ought to be cost based."

25 RMP is also talking about AMI meter fees. If

1 and when such meters get approved for recovery in base
2 rate costs for such meters -- where the cost of such
3 meters should be recovered on -- excuse me, once those
4 costs are approved -- once the costs are approved for
5 inclusion in base rates, then recovery should be made on
6 a nondiscriminatory basis without double recovery. I
7 apologize there.

8 The OCS also believes that having unused
9 export credits expire can still be a useful and effective
10 tool to ensuring the right sizing of solar facilities.

11 Lastly, the OCS also supports a compliance
12 phase in this proceeding so that after the Commission has
13 resolved the key substantive issues, the process for
14 future updates and refinements can be made clear.

15 We appreciate the Commission's diligence in
16 pursuing all the issues in this case. We hope we've
17 pointed a path through the issues that will aid the
18 Commissioners to come to a resolution.

19 We thank you for your time and hope that
20 OCS's position is clear.

21 COMMISSIONER LEVAR: Thank you, Mr. Snarr.
22 We appreciate your closing comments.

23 Commissioner Allen, do you have any questions
24 for Mr. Snarr?

25 COMMISSIONER ALLEN: No questions. Thank

1 you.

2 COMMISSIONER LEVAR: Okay. Thank you.

3 Commissioner Clark, do you have any
4 questions?

5 COMMISSIONER CLARK: I have no questions.
6 Thank you, Mr. Snarr.

7 COMMISSIONER LEVAR: Thank you. And I don't
8 either, so thank you again for your closing statements.

9 And we will go next to Vote Solar.

10 MR. MARGOLIN: Thank you, Commissioner.

11 Good afternoon -- good afternoon, Chair

12 LeVar, Commissioner Allen and Commissioner Clark. Thank
13 you for the time and care you have taken throughout this
14 proceeding and, of course, for allowing me to make some
15 closing remarks on behalf of Vote Solar today.

16 Before I speak to the evidence presented, I
17 want to emphasize that each party proposing a rate bears
18 the burden of demonstrating that its proposed rate is
19 just and reasonable. The unsubstantiated say-so or
20 intuition from a party cannot be relied upon.

21 Back-of-the-napkin calculations are insufficient.

22 Similarly, strings of unrealistic hypotheticals provide
23 the Commission no support.

24 The Commission requires evidence, hard math,
25 real science, actual calculations, all from qualified

1 witnesses. Through this lens, it is clear this Vote
2 Solar has met its burden through the rigorous work of its
3 expert witnesses, whereas RMP and the OCS fall well
4 short. The DPU has not proposed its own rate.

5 Likewise, in determining a just and
6 reasonable rate, the Commission is expressly permitted by
7 statute to consider the well-being of the State of Utah
8 and means of encouraging energy conservation.

9 Ms. Steward's contention that the Commission may only
10 consider direct avoided costs by RMP is incorrect.

11 Ms. Beck's contention that all this Commission is
12 permitted to consider are benefits accruing to non-CG
13 customers in their capacity as ratepayers is also
14 incorrect.

15 Vote Solar has presented substantial evidence
16 quantifying each benefit of CG exports it has proposed.
17 These calculations demonstrate that the benefits of CG
18 exports outweigh the costs and, thus, that there is no
19 subsidy from CG customers to non-CG customers. No party
20 has properly called into question any of Vote Solar's
21 calculations.

22 Accordingly, the Commission should institute
23 a new net metering program and should not adopt any new
24 rate structure until it has evaluated the question of
25 whether cost exceed benefits or vice versa. Vote Solar's

1 experts have been candid with the Commission. Their
2 testimony remaining consistent throughout the proceeding.
3 The same cannot be said through others. Mr. MacNeil,
4 Mr. Meredith and Ms. Steward all concede the value of CG
5 exports, as well as behind the meter CG, but refuse to
6 properly credit them for their value.

7 Mr. Meredith talked himself in circles trying
8 to defend RMP's proposed TOU rates, first telling the
9 Commission that these rates will drive customers to
10 export, when it is more economical to do so and more
11 valuable to the grid. But more recently in his
12 surrebuttal, completely changing course, telling the
13 Commission that these rates are designed with one goal in
14 mind; to reflect the value of CG solar.

15 Likewise, Mr. Meredith admitted countless
16 times that he had no hard evidence to support the rate
17 structure RMP proposes. All of RMP witnesses find
18 themselves in a massive contradiction as they now lobby
19 for a value far below the transition rate, which RMP
20 acknowledged just a few years ago was fair and
21 reasonable.

22 RMP shifting testimony should be seen for
23 what it is, blind advocacy of a tailor-made proposal to
24 disincentivize future CG investment in Utah. This
25 position makes sense for RMP, a vertically integrated

1 monopoly that maximizes profit when it controls all
2 aspects of energy generation and sales. CG exports, and
3 more broadly, CG cut into those profits.

4 RMP's loyalties are not to the captive rate
5 paying citizens of Utah. Rather, RMP is beholden to its
6 corporate shareholders in Nebraska, and RMP takes
7 positions purely designed to increase its own revenue and
8 deter competition. RMP has put forth a proposal designed
9 to make it untenable for CG installation to continue in
10 Utah.

11 And RMP has carved out two paths to achieve
12 that goal. First, it proposes an export credit so low
13 that there is almost no benefit for a CG customer to ever
14 export energy to the grid. RMP, thus, tries to eliminate
15 CG customers' ability to be compensated at a fair and
16 reasonable rate for their exports.

17 Second, RMP proposes a rate structure so
18 uncertain and so larded up with excessive fees that the
19 average consumer, households and small businesses are
20 unable to calculate the costs and benefits of installing
21 solar and will, therefore, opt not to do so.

22 In effect, RMP seeks to treat CG customers
23 like QFs, by paying them a low avoided cost rate while at
24 the same time, depriving CG customers of the rate
25 certainty that PURPA requires. If you choose either

1 approach, RMP gets what it wants, to deter CG solar in
2 Utah. But the Commission cannot countenance RMP's
3 attempt at a checkmate in this proceeding because neither
4 RMP's valuation of exports nor its proposed rate
5 structure are supported by any evidence.

6 The Commission is unable to look to the DPU
7 or the OCS for independent testimony. Counsel for both
8 DPU and the OCS often pushed harder on Vote Solar's
9 witnesses to defend RMP's position than even RMP did.
10 DPU witnesses Mr. Davis and Dr. Abdulle filed testimony
11 with the Commission, calling Dr. Lee's criticism of their
12 work baseless, yet both concede that they weren't able to
13 evaluate Dr. Lee's work, which was based on Mr. Davis's
14 own work papers.

15 The DPU's findings amount to little more than
16 copycatting RMP position and cannot be considered
17 independent. Moreover, the DPU's counsel suggested
18 during questioning that it would support a rate of 8.54
19 cents per kilowatt hour, based on no evidence provided by
20 DPU's own witnesses.

21 The OCS, too, has been carrying water for
22 RMP, with Ms. Beck admitting that the OCS came into this
23 proceeding with the unsupported yet galvanized assumption
24 that a subsidy and cost shift was already in existence.

25 The Commission will recall that Mr. Snarr

1 tried to demonstrate that this OCS is willing to
2 challenge RMP by pointing out that the OCS has, in
3 another proceeding, challenged RMP's proposed 10.2
4 percent rate of return, and instead, supported a 9
5 percent rate of return.

6 The best example the OCS could come up with
7 to argue for its independence was taking a position that
8 RMP should in this economy, and, frankly, in any economy,
9 obtain a virtually risk-free 9 percent rate of return.
10 This is a gold mine for RMP and supporting it should
11 never be mistaken as a badge of courage for the OCS.

12 What's more, this demonstrates RMP's standard
13 game plan. Ask for something so outrageous that this OCS
14 and DPU have cover to push back and still get RMP what it
15 wants. These dynamics were on full display here when at
16 the last minute, even after submitting corrected
17 surrebuttal testimony, Mr. Hayet decided to increase the
18 OCS's supported rate from 2.2 cents to 3.7 cents per
19 kilowatt hour. The OCS knows full well that even a rate
20 of 3.7 cents would be a tremendous win for RMP, and its
21 last minute increase fits perfectly into RMP's playbook.

22 What's most telling is that not a single
23 witness from RMP, the DPU, or the OCS could point to any
24 evidence of an actual subsidy or cost shift from CG to
25 non-CG customers. And you can be sure if there was any

1 evidence, they would have shouted it from the rooftops.
2 Despite countless allegations of a subsidy in their
3 written and oral testimony and even in their closing
4 statements, these allegations remain entirely
5 unsubstantiated.

6 Throughout the hearing, RMP, the DPU and the
7 OCS made a lot of noise about how reduced demand from CG
8 customers will supposedly shift fixed costs to non-CG.
9 However, no party presented any evidence of this supposed
10 cost shift. More fundamentally, this argument looks
11 behind the meter.

12 If the Commission is inclined to look behind
13 the meter, it must account for all of the behind the
14 meter benefits CG provides, including in the form of
15 reduced system demand. The suggestion that customer
16 generators are imposing a cost by purchasing less energy
17 from RMP is absurd. Surely, RMP does not seek to impose
18 such costs on its energy efficiency customers when they
19 reduce their bills.

20 Likewise, the suggestion that the true
21 benefit to customer generators is their ability to avoid
22 paying full rates for buying energy also improperly
23 relies on the unquantified behind the meter benefits and
24 the false assumption that RMP should get any credit for
25 not finding a way to charge customers for energy RMP

1 played no role in generating.

2 The Commission has no basis to find any
3 subsidy from CG to non-CG customers. By contrast, Vote
4 Solar has presented un-rebutted evidence that the
5 benefits of CG exports and, therefore, the net metering
6 program exceed costs and that, in fact, CG customers
7 currently subsidize non-CG customers.

8 Let's first turn to the evidence before the
9 Commission concerning competing valuations of CG exports,
10 Starting specifically with avoided generation capacity
11 costs. You heard the testimony of Dr. Milligan who
12 explained that he calculated avoided generation capacity
13 costs by using an industry accepted methodology that
14 accounts for the variable nature of CG solar exports.

15 But RMP, the DPU, and until the middle of
16 this hearing, the OCS, attribute zero value to this
17 benefit. And on what basis? The simple notion that CG
18 customers don't have a contract to export. This ignores
19 reality. Contract or not, CG customers are captive
20 exporters. They invest substantial funds in generation
21 systems that, typically, last for 25 years, and the only
22 possible buyer for their exports is RMP.

23 In fact, RMP, DPU and OCS witnesses all
24 acknowledge that CG exports do offer value in the form of
25 avoided generation capacity. But RMP simply says no. No

1 contract, no capacity value. RMP, the DPU and the OCS
2 twist themselves in knots to create hypotheticals showing
3 why CG exports cannot be relied upon to defer or avoid
4 capacity costs.

5 What if a customer disconnects their panels
6 from the grid and uses them to charge a car? What if CG
7 customers are permitted to sell to a buyer other than RMP
8 in the future? What about a giant cloud or a broken
9 inverter? What these hypothetical scenarios all have in
10 common, besides being outlandish and unsupported by any
11 evidence, is that they intentionally ignore the aggregate
12 impact of all CG exports.

13 As Dr. Milligan, Dr. Berry and Dr. Worley
14 testified, it is improper to assess avoided capacity
15 value by looking at a single system. Instead, you must
16 look at the full geographically distributed population of
17 CG customers to understand their true value. CG systems
18 are spread across the state, and so function like a giant
19 QF but without the drawback of being located in a single
20 spot.

21 All the solar panels in Utah will never be
22 covered by a cloud, but the same cannot be said of a
23 single QF. It is precisely these characteristics that
24 Dr. Berry concluded makes CG solar less variable and more
25 resilient than QFs. By taking into account the aggregate

1 nature of CG exports as Dr. Milligan has done, you arrive
2 at the true avoided generation capacity value for CG
3 exports. The Commission should include this value as
4 calculated by Dr. Milligan.

5 While Vote Solar supports the OCS's sudden
6 decision to finally quantify avoided generation capacity,
7 the OCS's method of calculating this value is
8 unprincipled. As Mr. Hayet explained, in the few hours
9 between filing revised surrebuttal testimony and taking
10 the stand, he decided to attribute a value of less than
11 50 percent of what Vote Solar calculated, all because he
12 thought a discount would be appropriate.

13 This unscientific methodology, unsupported by
14 data, does not approach the standard of reliability that
15 this Commission requires. Avoided transmission and
16 distribution capacity costs have been calculated by
17 Dr. Yang and Mr. Volkmann, using the same methodology RMP
18 uses to calculate these benefits for its own energy
19 efficiency programs.

20 RMP refuses to credit this value because
21 Mr. Barker conducted a back-of-the-napkin calculation as
22 to whether a single cherry-picked project could be
23 deferred because of CG exports. Based on this, RMP
24 concludes that not a single transmission and distribution
25 project would be deferred in its service territory,

1 despite Mr. Barker's own admission that you have to look
2 at each T&D project on an individual basis to determine
3 if the project is deferrable, and if so, what the
4 deferral value is. Something Mr. Barker failed to do
5 entirely. Dr. Yang and Mr. Volkmann must be credited.

6 Dr. Milligan calculates avoided energy costs
7 using PacifiCorp's official forward price curve, which
8 the Company itself admits is the best available forecast
9 of future market prices. Does RMP rely on this? Of
10 course not.

11 Instead, RMP trots out two flawed methods.
12 First, RMP calculates avoided energy costs based on the
13 grid model. The trouble with RMP's use of the grid model
14 is that RMP manipulated it such that it no longer
15 functions as an economic dispatch model. RMP locks in
16 certain resources, credits other yet to be built
17 resources, ahead of CG that is already in the ground and
18 openly admits to other modification of grid's results.

19 On top of this, RMP uses historical EIM
20 prices to shape the models output, but as Dr. Milligan
21 testified, this nonsensically results in avoided costs
22 from CG being allocated to less expensive nighttime hours
23 when there is no solar generation. Perhaps, recognizing
24 these flaws, RMP retreated to relying on historical EIM
25 prices from the past three years, a methodology that

1 Mr. MacNeil aptly referred to as a "backcast."

2 According to businessdictionary.com,
3 backcasting is a reverse forecasting technique, which
4 starts with a specific outcome and then works backwards
5 to the present conditions, which appears to be precisely
6 what RMP has done here. It decided upon the lowest rate
7 it thought it could get away with, and then tried its
8 hardest to get the math to work right.

9 Moreover, as Dr. Milligan testified, relying
10 on historical prices to generate a future rate is
11 guaranteed to produce an inaccurate estimate of future
12 avoided energy costs. The Commission should adopt a
13 forward looking long term rate and in doing so should
14 rely upon a forward-looking methodology.

15 Dr. Berry calculated a benefit from avoided
16 fuel hedging costs. The proposition is a simple one.
17 RMP has a fuel hedging program. This program costs RMP
18 money. CG exports will reduce the amount of fuel RMP
19 needs to hedge, thus saving RMP money. RMP calculates no
20 benefit here, again, refusing to look at the aggregate
21 benefits of all CG exports and improperly focusing on the
22 impact of a single system.

23 Dr. Berry also calculated avoided carbon
24 compliance costs using RMP's own projections from its
25 2019 IRP. RMP's response is that such costs are not

1 presently incurred so should not be factored into any
2 ECR. But in setting a long-term rate, the Commission
3 should take into account not just present benefits to RMP
4 from CG exports but also future ones. And in this case,
5 costs that RMP itself is projecting and planning to
6 incur.

7 Similarly, Dr. Berry calculated avoided
8 environmental costs and avoided health costs due to
9 reduced carbon emissions. Dr. Berry relied upon RMP's
10 own calculation of the social cost of carbon from its
11 2019 IRP and EPA data to calculate the health benefits.
12 The argument that RMP does not receive a similar credit
13 is misguided. It is RMP that is generating these
14 environmental and health costs to begin with.

15 If RMP were assessed these costs, then Vote
16 Solar agrees that it will be fair to also credit RMP for
17 its carbon reduction efforts. But that counterfactual
18 does nothing to question the benefits that Dr. Berry has
19 quantified, and this Commission should seize the
20 opportunity to credit CG exports from proving the quality
21 of life in Utah.

22 Finally, Dr. Berry calculated the economic
23 benefits of CG exports in Utah. This includes job
24 benefits, economic growth and increase tax revenue.
25 Rather than challenge Dr. Berry's calculations, RMP, the

1 OCS and the DPU raised a specter of potential job losses
2 from CG solar, but they did not quantify this potential
3 loss or even offer a single piece of evidence supporting
4 the idea that CG solar is going to take people's jobs.

5 Moreover, and as Dr. Berry pointed out, RMP's
6 strategy is to build its own renewable projects out of
7 state, thus benefiting other states as Utah's expense.
8 She called this leakage. Dr. Berry's calculation, which
9 as she testified, looks only at jobs being brought back
10 to Utah from out of state should be credited.

11 RMP, the OCS and the DPU seek to further
12 diminish the value of CG exports by adjusting the export
13 credit rate downward to account for so-called integration
14 costs. RMP's proposed integration cost is based upon a
15 study that did not even assess the impact of CG solar.
16 There is no evidence before the Commission that CG
17 exports at current penetration levels, or at any
18 conceivable future penetration level, will impose such
19 costs.

20 RMP could have presented evidence to the
21 Commission of when it anticipates integration costs would
22 be incurred and an estimated value of such future costs.
23 If that evidence was reliable, Vote Solar would have
24 raised no challenge. Instead, RMP made the strategic
25 decision to rely upon its one-year rate, neglecting to

1 look forward. In doing to, RMP gave the Commission
2 nothing to rely upon. This is an insufficient basis for
3 the Commission to assess a cost.

4 So where does the evidence leave us as to the
5 value of CG exports? Vote Solar has presented
6 substantial expert evidence that the true value of CG
7 exports is 24.17 cents per kilowatt hour, and no party
8 has rebutted Vote Solar's findings. In fact, even if the
9 Commission were to disregard the community benefits that
10 RMP argues it will never have to pay, the value of CG
11 exports is 12.14 cents per kilowatt hour, still an excess
12 of current retail rates.

13 What's more, Vote Solar's calculation is
14 conservative, as it does not take into account the value
15 of CG's ancillary services, CG's reliability and
16 resiliency, avoided fossil fuel lifecycle costs, market
17 price effects, or the substantial behind the meter
18 benefits of CG, including deferred T&D capacity and
19 reduced demands on the grid during peak periods.

20 Although not quantified here, the Commission
21 is entitled to take these benefits into consideration.
22 Accordingly, the Commission should accept Vote Solar's
23 valuation and institute a new net metering program, which
24 will itself result in a subsidy running from CG customers
25 to non-CG but which is reflective of the principles of

1 proper rate design and provide the proper incentives for
2 CG solar adoption in Utah.

3 So let's turn to RMP's second front, rate
4 structure. Here, Vote Solar's proposal is simple and
5 easy to understand: Institute net metering and set the
6 export credit rate according to the applicable retail
7 rate, or in the alternative, set a fixed 20-year rate at
8 24.17 cents per kilowatt hour, and under either scenario,
9 use hourly netting and allow customers to keep the
10 credits they rightfully earn.

11 RMP's proposal is designed to sew uncertainty
12 by instituting annually changing rates, punitive fees,
13 and time of use and netting proposals that will only
14 increase customer confusion while driving inefficient
15 energy use. RMP's rate structure is designed to stop
16 CG's investment in its tracks. Instead of a net metering
17 or a fixed 20-year rate, RMP proposes, and the DPU and
18 the OCS support, a rate that resets annually. Something
19 no other customer is subject to.

20 In fact, the best RMP could do to justify
21 this discrimination against CG customers was to point to
22 certain rate riders that reset annually. But such riders
23 make up only a small portion of customers' rate, whereas
24 RMP proposes a wholesale CG rate redesign each year. RMP
25 knows that resetting rates annually will make it next to

1 impossible for any future CG customer to estimate
2 benefits of installing solar and, thus, become unlikely
3 to invest.

4 The Commission heard this point made
5 countless times during public comment yesterday.
6 Dr. Berry made this point clear throughout her testimony
7 and Mr. Meredith agrees that a less certain future could
8 make a customer less likely to purchase an investment.

9 The hypocrisy from RMP is thick as RMP would
10 never invest its capital without a virtually risk-free
11 rate of return, but it expects everyday CG customers to
12 invest without even knowing what their export credit will
13 be, insisting that customers can retain an expert like
14 the ones who appears in this proceeding if they want to
15 estimate their rate of return.

16 RMP knows that an uncertain rate will hurt
17 future CG and that is its intention. Not only does RMP
18 propose annually updated rates, but it also wants to
19 forfeit customers unused credits, the only compensation
20 they receive for the energy they produce and provide to
21 RMP.

22 Why take such an anti-CG position?
23 Supposedly, to prevent the system -- to prevent system
24 over-sizing. But the record is devoid of any facts
25 evidencing system over-sizing or that forfeiting credits

1 is a proper way to control this phantom problem.

2 Why not institute a cap on system sizes as
3 other states have done? Well, RMP invokes another
4 boogeyman with no evidence, the duplicitous solar
5 salesman who will necessarily max out every customer
6 solar array.

7 And what does RMP propose to do with these
8 expired credits? Deposit them in the energy balancing
9 account for the benefit of all ratepayers, which
10 Ms. Steward admitted on the first day of this hearing
11 constitutes a subsidy from CG customers to non-CG.

12 Let me repeat that. The party that has
13 alleged cost shifting and subsidy against customer
14 generators for years is now proposing to take credits
15 rightfully earned by customer generators and hand them
16 out to everyone. And this position is baselessly
17 supported by the OCS and the DPU. The Commission should
18 allow customers to keep what they rightfully earn.

19 And the problems with RMP's proposed rate
20 structure go on. RMP proposes \$310 in application and
21 metering fees, which no other customer is subject to, not
22 even those who apply for labor-intensive programs like
23 Cool Keeper and Wattsmart that require an RMP field
24 visit.

25 Mr. Meredith acknowledged that the metering

1 field be levied against all new CG customers, whether
2 they require a new meter or not. He also acknowledged
3 that CG customers will be charged when RMP rolls out new
4 meters to all of its customer. So not only is this a
5 punitive fee but CG customers will be double charged.
6 Mr. Meredith justifies the application fee as a way to
7 discourage non-serious applications. But when asked to
8 quantify how many such applications RMP received, all he
9 could say was that he didn't have a particular number but
10 that it happened.

11 As Dr. Lee has calculated, given the low
12 export credit rate RMP proposes, it would take an average
13 residential customer three years of exporting energy to
14 the grid to generate sufficient credits just to offset
15 the \$310 entry fee into the CG program. This is no
16 accident.

17 Finally, RMP proposes a time of use rate and
18 no netting. In his initial testimony, Mr. Meredith
19 defending these proposals as providing useful price
20 signals that would encourage customers to shift their
21 exports to times of high system demand. But now
22 Mr. Meredith backtracks, acknowledging that these
23 proposals, when combined with the grossly
24 disproportionate delivery rate, are not intended to send
25 the customer any price signals at all.

1 There is no debate that CG exports and behind
2 the meter CG provide valuable relief to the grid. RMP
3 acknowledges that CG exports and CG production provide
4 such benefits. Mr. Meredith acknowledged that increasing
5 exports during periods of high demand is beneficial for
6 the system. And both Mr. Meredith and Mr. MacNeil
7 acknowledge that every kilowatt of exported CG is energy
8 RMP does not have to produce and, thus, is a benefit to
9 RMP.

10 Rather than try to incentivize these
11 benefits, however, RMP tries its hardest to avoid them,
12 by setting a rate to incentivize customers to, in
13 Mr. Meredith's words, consume the power they produce
14 rather than export it to the grid.

15 In fact, Mr. Meredith conceded for a customer
16 to be able to take full advantage of the signal to avoid
17 exports at all costs, it would require battery storage,
18 an extra cost on top of already expensive solar systems
19 and a cost that RMP, of course, will not credit the
20 customer generator for. The Commission simply cannot
21 bless such an inefficient design whose only signal is to
22 consume at will.

23 In closing, the record contains no evidence
24 of any subsidy or cost shift going from CG to non-CG
25 customers. And the record is clear that the rate

1 structure that RMP proposes and that the DPU and the OCS
2 support is punitive based on no evidence and designed
3 purely to drive CG out of RMP's territory. Why? To
4 protect RMP from any erosion in its rate base, to keep
5 its customers captive.

6 On the other hand, the record reflects that
7 in each step, Vote Solar has quantified the benefit of CG
8 exports based upon industry-accepted methodologies. And
9 in each step, RMP, the DPU and the OCS have
10 unsuccessfully tried to drive down or outright deny the
11 clear benefit that CG exports provide.

12 All of the evidence demonstrates that Vote
13 Solar's proposed rate, whether based on net metering or
14 the true value of 24.17 cents per kilowatt hour, is
15 supported by reliable expert calculations and is designed
16 to incentivize the valuable growth of CG solar and all of
17 its substantial benefits, all at no cost to non-CG
18 customers.

19 Accordingly, Vote Solar respectfully asks the
20 Commission to accept Vote Solar's proposal. Thank you
21 again for your time and consideration.

22 COMMISSIONER LEVAR: Thank you for your
23 closing statements, Mr. Margolin.

24 I will go to Commissioner Allen, do you have
25 any questions for Mr. Margolin?

1 COMMISSIONER ALLEN: No, no questions. Thank
2 you.

3 COMMISSIONER LEVAR: Thank you, Commissioner.
4 Commissioner Clark, do you have any
5 questions?

6 COMMISSIONER CLARK: I have no questions.
7 Thank you for the presentation.

8 COMMISSIONER LEVAR: Okay. Thank you. I
9 don't have any additional questions either, so thank you
10 for your closing statements.

11 And I think at this point, we will take a
12 short break before we return for Mr. Holman and
13 Mr. Mecham's statements. Why don't we recess for ten
14 minutes and then return. Thank you.

15 (A discussion was held off the record.)

16 COMMISSIONER LEVAR: Welcome back everyone.
17 We will begin again and we will go next to Mr. Hunter
18 Holman, if you are ready.

19 MR. MARGOLIN: Chairman, if I can just very
20 briefly make two quick requests.

21 COMMISSIONER LEVAR: Go ahead.

22 MR. MARGOLIN: And I apologize for the
23 interruption Mr. Holman.

24 First, for the convenience for both the
25 Commission and the reporter, we would like to send a PDF

1 of our closing remarks. We would like to file those, if
2 that's okay.

3 COMMISSIONER LEVAR: In terms of whether
4 that's okay, I mean, anything that's emailed to
5 PSC@utah.gov we post onto the website. How it's treated
6 for evidentiary purposes sometimes could be up for
7 motion. But if it's emailed to that email address,
8 it's -- it will be posted to the website and provided to
9 the court reporter.

10 MR. MARGOLIN: Thank you. And our second
11 request is one to -- actually to Mr. Snarr and the OCS.
12 Following Mr. Hayet's testimony, they provided us with
13 some work papers that supported his, sort of, newer
14 calculations, and we would like those to be filed as part
15 of the record. Because right now, they are not and other
16 work papers are. So we would just like to complete
17 that -- that record, if we could.

18 COMMISSIONER LEVAR: Okay. Is that an
19 informal request for Mr. Snarr? Or -- well, I let just
20 let Mr. Snarr comment on this.

21 MR. SNARR: I noticed that I received a copy
22 of those work papers, either filing from the Commission.
23 I had assumed they were part of the record. I have no
24 objection that they become part of the record. And --

25 MR. MARGOLIN: Okay. Thank you, Mr. Snarr.

1 We will work that out off line then. Thank you.

2 MR. SNARR: Okay.

3 COMMISSIONER LEVAR: Okay. Thank you.

4 With that, we will go to Mr. Holman.

5 MR. HOLMAN: Thank you, Chair LeVar. Good
6 afternoon, chairman LeVar, Commissioner Clark and
7 Commissioner Allen.

8 Throughout this hearing and throughout this
9 proceeding, we have heard from almost all parties on what
10 their interpretation of the scope of this proceeding is.
11 And I would like to just start by reading a very clear
12 excerpt from 2017 settlement stipulation, which defines
13 the scope of this proceeding perfectly clearly.

14 Paragraph 30 of the settlement stipulation
15 read: In the export credit proceeding, the Commission
16 will determine a just and reasonable rate for export
17 credits for customer generated electricity. Parties may
18 present evidence addressing reasonably quantifiable costs
19 or benefits or other considerations they deem relevant.
20 And each party has the burden of proof to establish that
21 any consideration that they submit to the Commission for
22 consideration is proven.

23 The settlement stipulation does not
24 predetermine any -- any consideration or factor that the
25 Commission may use in its determination of the export

1 credit. The settlement stipulation does not predetermine
2 what considerations parties to this proceeding may
3 present to the Commission to aid the Commission in its
4 determination of an export credit proceeding.

5 And similarly, the standard that applies to
6 the Commissions' determination of an export credit rate,
7 the just and reasonable standard, broadly includes
8 considerations like the well-being of Utah and whether
9 the decision will encourage conservation of resources and
10 energy.

11 In light of this scope and a standard that
12 governs the Commission's determination of this
13 proceeding, Utah Clean Energy believes that an export
14 credit rate based on Vote Solar's utility-based benefits
15 not only captures the value of exported CG most
16 accurately, but it will result in the most just and
17 reasonable outcome for Utah.

18 Vote Solar retained a group of highly
19 experienced experts to develop and present their
20 analysis. These experts derived their conclusion from a
21 robust load research study with a much larger sample than
22 Rocky Mountain Power's and evaluated the range of costs
23 and benefits that are commonly included in the evaluation
24 of exported solar energy. Rocky Mountain Power presented
25 a proposal that considered only a small fraction of the

1 costs and benefits attributable to exported solar energy
2 and hasn't justified their exclusion of significant
3 categories of benefits.

4 Given that we've heard from witnesses from
5 each party directly in this hearing and prior to the
6 hearing, I won't try and reiterate all of the evidence in
7 my closing statement that Utah Clean Energy is supportive
8 of, but I would like to say that Vote Solar's analysis is
9 the most comprehensive analysis presented to the
10 Commission in this docket, certainly in terms of the
11 number and type of benefits analyzed.

12 Excluding Vote Solar's utility-based benefits
13 from the export credit rate or assigning zero value for
14 these benefits intentionally ignores the value that
15 exported customer generation provides the grid and would
16 not result in a just and reasonable rate.

17 We also heard evidence during the hearing
18 that Utah's solar industry would be harmed if Rocky
19 Mountain Power's proposal is adopted, and a number of
20 comments last night during the public hearing adopted the
21 same sentiment.

22 What Utah Clean Energy's primary
23 recommendation is that the Commission accept Vote Solar's
24 utility-based benefits because they represent the most
25 accurate valuation of exported CG. Adopting an export

1 credit based on these benefits will also create stability
2 in the rooftop solar industry.

3 Over the years, Utah policymakers have
4 created conditions and incentives intended to foster and
5 nurture the growth of the rooftop solar industry. The
6 state has enjoyed thousands of jobs and tax revenue as a
7 result of these policies, and some parties to this
8 proceeding argue that consideration of jobs and economic
9 development is outside the scope of the export credit
10 proceeding, though I respectfully disagree with them.

11 These considerations are clearly -- clearly
12 go to the well-being of the state of Utah, which is one
13 of the factors that contributes to a just and reasonable
14 rate, and one of the factors that the Commission may
15 consider when calculating any rate in the state of Utah,
16 including the new export credit rate under Schedule 137.

17 The Commission's decision in this docket will
18 have a profound effect on the rooftop solar industry, and
19 Utah Clean Energy recommends that the Commission consider
20 this when it determines its just and reasonable export
21 credit rate.

22 As Ms. Bowman said in the summary of her own
23 testimony, the outcome of this proceeding will have
24 long-term impact that shape Utah's energy landscape and
25 determine whether one of the sunniest states in the

1 country remains a viable market for rooftop solar.

2 Utah Clean Energy believes that Vote Solar's
3 utility-based benefits represent the most accurate value
4 for exported CG, and that an export credit rate based on
5 these benefits will support an important industry in the
6 state and promote the well-being of Utah generally.

7 That concludes my closing statements. Thank
8 you very much, Commissioners, for your consideration in
9 the matter.

10 COMMISSIONER LEVAR: Thank you, Mr. Holman.

11 Commissioner Allen, do you have any questions
12 for Mr. Holman?

13 COMMISSIONER ALLEN: Sorry, I do not. I do
14 not, thanks.

15 COMMISSIONER LEVAR: Okay. Thank you,
16 Commissioner Allen.

17 Commissioner Clark, do you have any
18 questions?

19 COMMISSIONER CLARK: I have no questions.
20 Thank you, Mr. Holman.

21 COMMISSIONER LEVAR: Okay. And I don't have
22 either, so thank you.

23 Before we go to Mr. Mecham, I just realized
24 that when we talked about closing statements last week, I
25 did ask Mr. Mecham and Mr. Holman if they needed any

1 additional time for Utah Solar Energy Association and for
2 Salt Lake City. I didn't go to Mr. Evans and Mr. Thomas
3 to see if they wanted to make any closing statements
4 directly on behalf of those two intervening parties.

5 So let me just briefly see if there is desire
6 for that, if anyone know -- Mr. Mecham, if you know that
7 or if Mr. Evans or Mr. Thomas, it looks like you are both
8 on -- on the video chat right now.

9 MR. EVANS: Hello Chair LeVar, I'm
10 comfortable with Mr. Mecham representing the final
11 thoughts from the Utah Solar Energy Associate. Thank
12 you.

13 COMMISSIONER LEVAR: Okay. Thank you, Mr.
14 Evans.

15 MR. THOMAS: And Mr. Chair, this is
16 Christopher Thomas with Salt Lake City. We do not
17 request any additional opportunity.

18 COMMISSIONER LEVAR: I'm sorry, you cut out a
19 bit. Can you repeat that, Mr. Thomas?

20 MR. THOMAS: Oh, my apologies. We do not
21 request any additional opportunity for closing argument.
22 Thank you.

23 COMMISSIONER LEVAR: Okay. Thank you both or
24 that diversion.

25 Mr. Mecham, we will go to you.

1 MR. MECHAM: Thank you, Mr. Chair and
2 Commissioners, and good afternoon.

3 In this proceeding, Vivint Solar has
4 recommended an export credit rate of 10.2 cents per
5 kilowatt hour. That recommendation is quantified on
6 pages 3 through 5 of Dr. Chris Worley's surrebuttal
7 testimony. It's founded solely on utility base costs
8 that Rocky Mountain Power avoids by having customer
9 generated power available to them as a resource.

10 Vivint Solar's recommendation complies with
11 the Commission's July 1, 2015 order in this docket, in
12 that it is comprised of quantifiable components that
13 accrue solely to the benefit of Rocky Mountain Power and
14 its non-net metering customers as rate payers.

15 The solar parties have expended significant
16 resources to quantify the costs rooftop solar helps Rocky
17 Mountain Power avoid. They've explained in detail how it
18 results in avoided energy, avoided capacity and avoided
19 transmission and distribution costs to Rocky Mountain
20 Power.

21 The Commission can manipulate the formulae to
22 test the results. These parties have met the burden the
23 Commission imposed on them to demonstrate that the
24 benefits of customer generated power outstripped any
25 costs. Despite the criticisms of Rocky Mountain Power,

1 the Division and the Office, none of them have offered
2 analyses constituting substantial evidence to the
3 contrary.

4 Rocky Mountain Power has recommended the
5 export credit rate be set at their avoided cost for
6 energy, adjusted slightly for some avoided line losses.
7 They refuse to recognize any value created by the
8 decreased demand inherent in customer generation or the
9 transmission in distribution costs they avoid by having
10 power generated where it's consumed.

11 The Company argues they're just trying to be
12 fair to their non-solar customers by ensuring these
13 customers not pay for more customer generated power than
14 for energy with similar characteristics Rocky Mountain
15 Power can purchase on the market.

16 Parties to the proceeding recognize CG power
17 is not the same as QF power, qualifying facility power,
18 but the fact is, Rocky Mountain Power proposes to treat
19 customers producing their own power worse than qualifying
20 facilities.

21 Under RMP's plan, the export rate for CG
22 customers will change annually, rather than setting it
23 for 15 or 20 years. That, together with RMP proposed
24 instantaneous netting, make it impossible for CG
25 customers to determine the economics of their system.

1 The Navigant study in the 2019 Rocky Mountain Power
2 integrated resource plan makes clear that cost savings is
3 the principal reason customers install a solar system.

4 Companies ostensible reason for this
5 treatment that CG customers make no long-term commitment
6 make power available to Rocky Mountain Power. That
7 position, however, fails to recognize that power CG
8 customers consume reduces RMP's demand in all events, and
9 CG customers have nowhere else to go but to Rocky
10 Mountain Power to sell any excess power.

11 RMP proposes discriminatory application and
12 meter fees that discourage potential CG customers. And
13 in spite of what I think I heard Ms. Wegener say about
14 the application fee, it is not the same as that that's
15 part of the transition program today, where the vast
16 majority of the people, certainly the vast majority of
17 residential customers, pay only \$60, even though we don't
18 support that in this docket.

19 Rocky Mountain Power's overall proposal
20 discourages CG power and incense storage, which makes an
21 already expensive solar system cost prohibitive. This
22 position is shortsighted. To the extent CG customers can
23 afford and install storage, RMP may find they lose
24 benefits CG power can provide if the customers consume
25 all the power they produce.

1 Additionally, when storage becomes broadly
2 economic and available, RMP runs the risk of losing CG
3 customers completely, which will leave the company with
4 stranded investment. And there is precedent for this
5 sort of thing in the telecommunications industry. When
6 the legislature in Utah fortunately deregulated the
7 telecommunications industry in 1995, everyone thought the
8 competition would come from wire line competition. One
9 carrier would buy the elements of another.

10 But what happened was technology superceded
11 that, and the cell phone has, like a tidal wave, has
12 virtually overcome wire line competition. I think we
13 will see some of that same activity and result in
14 this -- in this arena. And if Rocky Mountain Power
15 continues to treat their CG customers this way, there
16 will be incentive to leave the system and leave Rocky
17 Mountain Power with loads of stranded investment.

18 The Division's position in this proceeding
19 and predecessor proceedings has never changed,
20 irrespective of the evidence presented. For years,
21 they've advocated that the export rate be set at Rocky
22 Mountain Power's avoided cost. With the exception of the
23 addition of an adjustment for minor line losses, the
24 Company proposed and the Division accepted, the position
25 is the same that it has -- as it was in 2014.

1 We maintain that solar customers impose large
2 costs on non-solar customer, while at the same time,
3 finding that the penetration levels of CG solar are so
4 low they provide no system benefits. Finding that CG
5 does not avoid particular costs to provide certain
6 benefits at current attrition levels is a circular,
7 impossible standard to meet. Adoption of a proposal that
8 disincentives CG will never allow penetration to increase
9 and leave the industry in a position by which the
10 Division is critical in its testimony.

11 The Office has also advocated that the export
12 rate be set at RMP's avoided costs, but they acknowledge
13 the value of some of the utility-based costs RMP could
14 avoid with CG power and attempted to ascribe numbers to
15 them. Rather than holding to a non-zero value for
16 avoided capacity, Office witness, Mr. Phil Hayet, shared
17 his calculation for avoided capacity of 1.41 cents per
18 kilowatt hour in the summary of his testimony. A little
19 late but at least it was an attempt.

20 His method was to set the rate at 50 percent
21 of the average of Vivint Solar's and Vote Solar's
22 proposals for avoided capacity. While this method is not
23 unprecedented in utility regulation, it is far less
24 precise or supportable in the positions and the evidence
25 that Vivint Solar and Vote Solar offered in calculated

1 and proposed.

2 We recognize the Office's effort but reject
3 the values they ascribe as inadequate and noncompensatory
4 and not supported. We also strongly disagree with the
5 Office's refusal to recognize any value for avoided
6 transmission and distribution costs.

7 With Rocky Mountain Power's transmission and
8 distribution systems in serious need of investment today,
9 just to accommodate existing needs, it's incomprehensible
10 not to compensate CG customers who avoid both today.

11 Rocky Mountain Power, the Division and the
12 Office have consistently argued that non-solar customers
13 subsidize solar CG customers. Substantial unassailed
14 evidence now on this record turns the tables on that
15 argument. Failing to recognize and credit CG customers
16 for the benefits and actual quantified costs they allow
17 Rocky Mountain Power to avoid, will result in
18 discriminatory rates for CG customers, not for the other
19 non-solar customers.

20 By failing to recognize that benefits of
21 CG -- CG power, excuse me, outstrip costs, the rates
22 Rocky Mountain Power, the Division and the Office
23 proposed are unjust, unreasonable and discriminatory
24 against CG customers in violation of Utah Code Annotated
25 Sections 54-3-1 and 54-4-4.

1 This proceeding is among the most
2 consequential this Commission will decide. Your decision
3 will either enable and perpetuate an important utility
4 resource that benefits Rocky Mountain Power and its
5 ratepayers to develop further, or it will end a viable
6 industry that provides customers a competitive choice
7 through private investment, and it will further intrench
8 Rocky Mountain Power's monopoly against the public
9 interest

10 Utah Solar Energy Association witness, Ryan
11 Evans, testified that during the negotiations leading to
12 the stipulation, Commission approved in Docket
13 14-035-114, Governor Herbert asked parties to work for a
14 solution in the long-term would be a win for Rocky
15 Mountain Power, a win for the solar industry and a win
16 for customers.

17 Adoption of Rocky Mountain Power's proposal
18 or the recommendations the Division and the Office make
19 would be a conquest to Rocky Mountain Power, a route to
20 the solar industry and an irreparable loss for customers,
21 competition and the State of Utah.

22 I, instead, urge the Commission to adopt
23 Vivint Solar's position which more closely reflects the
24 governor's vision.

25 Thank you, Mr. Chair and Commissioners.

1 COMMISSIONER LEVAR: Thank you for your
2 closing statements, Mr. Mecham.

3 Commissioner Clark, do you have any questions
4 for Mr. Mecham?

5 COMMISSIONER CLARK: I have no questions.
6 Thank you. I apologize, it took me a second to find my
7 buttons on my computer.

8 Thank you, Mr. Mecham.

9 COMMISSIONER LEVAR: Thank you, Commissioner.
10 Commissioner Allen, do you have any
11 questions?

12 COMMISSIONER ALLEN: I have no questions.
13 Thank you.

14 COMMISSIONER LEVAR: And I don't either. So
15 thank you.

16 And thank you to everyone who has provided
17 closing statements today. Does anyone have anything
18 further?

19 MR. MECHAM: Mr. Chair, do you have any idea
20 how long the deliberation will go on this matter?

21 COMMISSIONER LEVAR: I can provide a firm
22 commitment that we will not issue an order tomorrow or
23 this week. I can't give you anything other than that. I
24 mean, we recognize that the settlement stipulation that
25 we approved in a previous docket contemplated a January

1 1st date. I don't think I'm -- I have enough information
2 at my fingertips to say any more than that at this point.

3 MR. MECHAM: Okay. I appreciate that. Thank
4 you.

5 COMMISSIONER LEVAR: We never -- we never
6 object to that question being asked, and we do endeavor
7 to provide answers to the extent that we can.

8 I will say this: We have a general rate case
9 ahead of us too, and our resources are limited, so we are
10 going to be dealing with both of those -- both this
11 docket and that docket and the necessary decision points
12 that we have from those. And I think I've said as much
13 as I can fairly say on the issue.

14 MR. MECHAM: I accept that. Thank you.

15 COMMISSIONER LEVAR: Okay. Thank you.

16 Anything further from anyone else? Okay.
17 Well, thank you always for your participation, especially
18 thank you for your patience in working through a format
19 that was new to us for a hearing. And we are adjourned.

20 (The hearing was concluded at 3:00 P.M.)

21

22

23

24

25

REPORTER'S CERTIFICATE

State of Utah)
)
County of Salt Lake)

I hereby certify that the witnesses in the foregoing hearing were duly sworn to testify to the truth, the whole truth, and nothing but the truth in the within-entitled cause;

That said hearing was taken at the time and place herein named;

That the testimony of said witnesses were reported by me in stenotype and thereafter transcribed into typewritten form.

I further certify that I am not of kin or otherwise associated with any of the parties of said cause of action and that I am not interested in the events thereof.

IN WITNESS WHEREOF, I set my hand this 17th day of October, 2020.



Kellie Peterson, RPR

	2.25 37:11	
\$	2.27 27:6	5
\$310 58:20 59:15	2.35 27:2	5 70:6
\$60 72:17	20 71:23	5.54 27:11
0	20-year 56:7,17	50 37:23 50:11
015 37:7	2014 73:25	6
1	2015 9:5 31:16 32:1 70:11	6 5:1,4
1 9:5 31:15,17,22 32:10 70:11	2017 7:12 32:21 64:12	8
1.41 38:1	2018 22:24	8.54 45:18
10 15:8 22:24 32:1	2019 52:25 53:11 72:1	9
10.2 46:3 70:4	2020 5:1,4 19:23	9 46:4,9
114 8:11 9:5	2032 7:17 32:25	90 32:24
12.14 55:11	2035 7:16 32:19	A
135 19:1 25:11	24 6:13	Abdulle 45:10
136 13:24 19:1,22	24.17 55:7 56:8 61:14	ability 19:25 44:15 47:21
137 19:2,17 26:1 29:18 67:16	25 48:21	absent 19:12
14-035-114 22:11 23:21 31:16 32:10	27.65 15:8	absurd 47:17
15 17:17 32:21 33:25 71:23	29 7:12	accept 12:25 17:20 55:22 61:20 66:23
15-year 33:17	3 70:6	accepted 48:13 73:24
17-035-61 5:6	3.37 27:9	accident 59:16
1995 73:7	3.7 38:4 46:18,20	account 6:10 9:23 10:15 14:19 15:11,24 16:4 17:4 27:19 47:13 49:25 53:3 54:13 55:14 58:9
1:00 5:1	30 64:14	accounted 13:17
2	31 19:23 32:19,25	accounts 48:14
2 6:15 27:1	4	accrue 31:18 70:13
2.2 46:18	4.6 15:23	

accruing 42:12	admission 51:1	aid 40:17 65:3
accurate 12:8 13:25 66:25 68:3	admits 10:18 51:8,18	air 34:22
accurately 13:1 65:16	admitted 11:6 15:24 16:12 17:1 43:15 58:10	align 6:11
achieve 44:11	admittedly 25:9	aligning 18:22
acknowledge 35:22 48:24 60:7	admitting 45:22	allegations 47:2,4
acknowledged 43:20 58:25 59:2 60:4	adopt 14:7 42:23 52:12	alleged 58:13
acknowledges 60:3	adopted 23:23 66:19,20	Allen 5:22 20:4,6,10,12, 22 21:1,21 30:15,17 40:23,25 41:12 61:24 62:1 64:7 68:11,13,16
acknowledging 59:22	Adopting 66:25	allocated 51:22
acquire 39:11	adoption 23:5 56:2	allocating 28:2
acquired 27:12,22	adopts 23:19	allowing 41:14
act 9:19	advanced 33:13	alternative 26:19 27:16 56:7
acted 23:18	advantage 12:19 60:16	alternatives 29:7
activity 73:13	advocacy 43:23	AMI 17:24 18:2,8,14,17 39:25
actual 6:11 28:2 38:23 41:25 46:24	advocated 73:21	amount 18:16 25:6,13 37:11,18 45:15 52:18
add 27:9,11	advocates 35:21	ample 25:1
adder 38:1	advocating 12:15	AMR 18:4
addition 27:2 37:16 73:23	affect 10:1 13:16 35:14 36:15	analyses 71:2
additional 32:1 39:11 62:9 69:1,17,21	affirmed 9:1	analysis 8:14 9:6,15 14:6 22:22 31:22 65:20 66:8,9
Additionally 73:1	afford 72:23	analyze 33:20
address 23:5 24:3 38:9 63:7	afternoon 5:3,21 21:20 30:23 41:11 64:6 70:2	analyzed 66:11
addressing 64:18	aggregate 49:11,25 52:20	analyzing 14:7
adequately 33:20	agree 11:21 14:11 23:9	ancillary 55:15
adjusted 26:9 71:6	agreed 18:22 36:23	annual 17:8 29:19 36:3, 13
adjusting 54:12	agreement 23:7 32:14	annually 6:11 17:8 56:12,18,22,25 57:18 71:22
adjustment 73:23	agreements 33:16	
administrative 23:20	agrees 10:5 14:15 53:16 57:7	
	ahead 5:18 13:9 51:17 62:21	

anti-cg 57:22	arguments 5:5,11,15	21 52:12,15,23 53:7,8
anticipated 39:10	arrangements 33:17	55:16 70:18 71:5,6 73:22
anticipates 54:21	array 58:6	avoids 70:8
apologies 69:20	arrive 14:6 50:1	
apologize 20:20 40:7 62:22	ascribed 14:14	<hr/> B <hr/>
appears 8:4 10:4 14:15 52:5 57:14	asks 9:22 29:13 61:19	back 5:4 6:9 20:18,19,20 34:2 36:6 38:6 39:19 46:14 54:9 62:16
applicable 16:17 19:1 33:11 56:6	aspects 32:15 44:2	back-of-the-napkin 41:21 50:21
application 5:6 6:2 7:18, 20 17:21 19:16,22 32:18 39:22,24 58:20 59:6 72:11,14	assess 49:14 54:15 55:3	backcast 52:1
applications 19:23 59:7, 8	assessed 53:15	backcasting 52:3
applied 12:3,6 38:5	assessment 36:1,3	background 33:4
applies 65:5	assessments 36:17	backtracks 59:22
apply 15:17 31:4 33:3,14 36:10 58:22	assigning 66:13	backwards 52:4
applying 28:13 32:20	Associate 69:11	badge 46:11
approach 45:1 50:14	Association 9:20 69:1	balancing 6:10 58:8
appropriately 6:3	assumed 63:23	Barker 16:20 50:21 51:4
approve 10:24 11:1 19:16,18,21 29:17	assumption 38:3 45:23 47:24	Barker's 51:1
approved 7:12 32:13 38:18 40:1,4	attempt 45:3	base 40:1,5 61:4 70:7
aptly 52:1	attention 5:10	based 8:19 9:2 10:4 11:7, 15 12:1,5 14:12 17:5,22 19:14 33:2 34:7,8,13 35:2 38:3 39:24 45:13,19 50:23 51:12 54:14 61:2, 8,13 65:14 67:1 68:4
arena 73:14	attributable 16:22 66:1	baseless 45:12
argue 24:15 46:7 67:8	attribute 48:16 50:10	baselessly 58:16
argued 22:22	authority 23:13 34:6,18 35:17	basic 18:6
argues 55:10 71:11	average 37:24 44:19 59:12	basis 24:14 36:13 40:6 48:2,17 51:2 55:2
argument 47:10 53:12 69:21	avoid 47:21 49:3 60:11, 16 70:17 71:9	battery 60:17
	avoided 11:23,24 12:3,7, 15,20 14:14,22,23 16:5, 24 19:19,20 27:15,22 28:10,12 34:24 36:19,22 37:4,8,10,12,24 39:1 42:10 44:23 48:10,12,25 49:14 50:2,6,15 51:6,12,	bear 6:16
		bearing 25:21

bears 32:7 41:17
Beck 39:23 45:22
Beck's 42:11
begin 5:10,16 53:14
62:17
beginning 18:19
behalf 41:15 69:4
behavior 13:3
beholden 44:5
believes 12:7 32:5 40:8
65:13 68:2
beneficial 60:5
benefit 7:5 9:6,24 15:13,
15 16:3 17:10 31:22,23
36:4 42:16 44:13 47:21
48:17 52:15,20 58:9 60:8
61:7,11 70:13
benefiting 54:7
benefits 6:4,21,22 8:7,
18,23 9:14,15,25 10:6,16
11:22 14:11,22,23 17:4
18:11 24:7,8 25:5 27:8,9,
17 28:20 29:24 31:12,18
34:4,22,23,25 35:11
36:4,14,18 42:12,17,25
44:20 47:14,23 48:5
50:18 52:21 53:3,11,18,
23,24 55:9,18,21 57:2
60:4,11 61:17 64:19
65:14,23 66:1,3,11,12,
14,24 67:1 68:3,5 70:24
72:24
Berry 17:1 18:22 27:5
49:13,24 52:15,23 53:7,
9,18,22 54:5 57:6
Berry's 53:25 54:8
billing 19:24 29:18

bills 47:19
binding 23:15
bit 69:19
bless 60:21
blind 43:23
bolster 11:2
boogeyman 58:4
Bowman 18:21 67:22
break 62:12
briefly 9:20 62:20 69:5
broadly 44:3 65:7 73:1
broken 49:8
brought 5:10 54:9
build 54:6
built 51:16
bundled 24:25 28:8
burden 32:7 38:12 41:18
42:2 64:20 70:22
business 27:24 28:2
businessdictionary.com
52:2
businesses 44:19
buy 73:9
buyer 48:22 49:7
buying 47:22

C

calculate 44:20 50:18
53:11
calculated 25:10 37:24
38:2,7 48:12 50:4,11,16
52:15,23 53:7,22 59:11

calculates 51:6,12 52:19
calculating 11:24 19:19
28:11 50:7 67:15
calculation 15:7,16,25
27:5,15 38:1 50:21 53:10
54:8 55:13
calculations 26:8 41:21,
25 42:17,21 53:25 61:15
63:14
California 16:15
called 42:20 54:8
calling 45:11
candid 43:1
cap 8:3 58:2
capacity 9:8,25 14:22,23
15:6,7,9,15,17,18,19,21,
22,25 16:1,3 23:19
26:10,11,25 31:19 37:12,
17,18 39:8,11 42:13
48:10,12,25 49:1,4,14
50:2,6,16 55:18 70:18
capital 16:6,11,14,21
57:10
caps 12:15
captive 44:4 48:19 61:5
capture 36:13
captures 65:15
car 49:6
carbon 10:10,12,13
26:12,13 34:23 52:23
53:9,10,17
care 41:13
carefully 37:14
carrier 73:9
carrying 45:21

carved 44:11

case 12:18 18:8 30:1
40:16 53:4

categories 66:3

category 32:2

cell 73:11

census 14:2,4

cent 38:1

cents 6:13,15 27:2,6,10,
11 37:7,11 38:4 45:19
46:18,20 55:7,11 56:8
61:14 70:4

certainty 13:12 33:19
44:25

CG 24:4 42:16,17,19
43:4,5,14,24 44:2,3,9,13,
15,22,24 45:1 46:24
47:7,14 48:3,5,6,9,14,17,
19,24 49:3,6,12,17,24
50:1,2,23 51:17,22
52:18,21 53:4,20,23
54:2,4,12,15,16 55:5,6,
10,18,24 56:2,21,24
57:1,11,17 58:11 59:1,3,
5,15 60:1,2,3,7,24 61:3,
7,11,16 65:15 66:25 68:4
71:16,21,24 72:5,7,9,12,
20,22,24 73:2,15

CG's 55:15 56:16

Chair 5:21 21:4 41:11
64:5 69:9,15 70:1

chairman 21:16,20 62:19
64:6

challenge 22:19 46:2
53:25 54:24

challenged 46:3

change 11:7 12:23 33:7
71:22

changed 73:19

changing 43:12 56:12

characteristics 49:23
71:14

charge 47:25 49:6

charged 9:2 59:3,5

charges 18:4

chat 69:8

checkmate 45:3

cherry-picked 50:22

choice 11:14 18:6 28:18

choose 6:3,18 44:25

Chris 70:6

Christopher 69:16

circles 43:7

citizens 44:5

City 24:18 69:2,16

clarification 32:1

Clark 5:21 20:12 21:7,9,
21 30:9,11,14 41:3,5,12
62:4,6 64:6 68:17,19

Clean 24:17 65:13 66:7,
22 67:19 68:2

clear 22:25 26:20 39:2
40:14,20 42:1 57:6 60:25
61:11 64:11 72:2

close 14:2 19:22

closing 5:5,10,15,19
21:13 30:2,21 40:22
41:8,15 47:3 60:23 61:23
62:10 63:1 66:7 68:7,24
69:3,21

cloud 49:8,22

CO2 38:21,22,23

combined 59:23

comfortable 69:10

comment 39:20 57:5
63:20

comments 30:5 40:22
66:20

commission 5:6 6:8 7:12
8:2,6,13,24 9:6,9,13
10:8,22,24 11:15 12:12,
22,25 13:20 14:6,17
15:13,14 16:2,5,10
17:20,23 19:16,17 20:12
22:25 23:10,11,14,16,18,
23,24 24:5 25:4,7 29:17,
22 31:10,17,25 32:12,13
34:3 35:1,6,16,18,25
36:10,18 40:12 41:23,24
42:6,9,11,22 43:1,9,13
45:2,6,11,25 47:12 48:2,
9 50:3,15 52:12 53:2,19
54:16,21 55:1,3,9,20,22
57:4 58:17 60:20 61:20
62:25 63:22 64:15,21,25
65:3 66:10,23 67:14,19
68:16 70:21,23

Commission's 9:10,18
10:2,5 12:1 26:2 31:14,
15 34:18 40:15 65:12
67:17 70:11

Commission-approved
12:2,20

Commissioner 5:3,21,22
20:3,4,6,8,9,10,12,15,22,
23 21:1,5,7,9,11,17 30:4,
9,11,13,15,17,19,24
40:21,23,25 41:2,3,5,7,
10,12 61:22,24 62:1,3,4,
6,8,16,21 63:3,18 64:3,6,
7 68:10,11,13,15,17,19,
21 69:13,18,23

Commissioners 5:12 21:21 30:3,6 31:1 40:18 68:8 70:2	completely 43:12 73:3	conservation 42:8 65:9
Commissions' 65:6	complex 29:12	conservative 55:14
commit 15:5 17:14	compliance 10:11 26:12 38:21,23 40:11 52:24	consideration 10:14 11:9,11,15 55:21 61:21 64:21,22,24 67:8 68:8
commitment 22:19 72:5	complicated 22:1	considerations 64:19 65:2,8 67:11
commitments 33:9 37:22	complies 70:10	considered 35:25 45:16 65:25
commodity 27:3 28:7	component 11:1 14:18	consistent 9:10,11 17:13,22 19:4 31:3 32:2 33:3 43:2
common 49:10	components 10:8 11:20 26:4 70:12	Constantine 18:21
commonly 65:23	comprehensive 66:9	constitutes 58:11
community 6:22 9:19,23 55:9	comprised 70:12	constituting 71:2
Companies 72:4	concede 43:4 45:12	construct 33:9
company 6:12,13 7:17 8:15 9:24 10:10,15,20 11:16,22,23 12:7,11,17 13:6,10,21 14:11,13 15:1 16:7,20 17:13,21 18:4,7 19:13,15 51:8 71:11 73:3,24	conceded 60:15	constructing 33:22
company's 6:1,10 7:15, 20 8:20 12:19 13:4,16,23 14:7,15 17:5 18:1,9,24 19:4,18	conceivable 54:18	consume 19:3 60:13,22 72:8,24
compared 17:17 26:22 27:3,7	concerned 12:11	consumed 71:10
comparison 26:16,19	concerns 33:10,23	consumer 24:22 44:19
compensate 21:25	conclude 31:17	consuming 22:20
compensated 44:15	concluded 49:24	consumption 15:12
compensates 6:3 17:8	concludes 30:2 50:24 68:7	contention 42:9,11
compensation 6:17 7:4, 21 15:6 34:13 57:19	conclusion 19:24 25:3 27:18 65:20	context 38:17
competing 25:8,22 48:9	conditions 52:5 67:4	continually 9:1
competition 44:8 73:8,12	conducted 14:2 50:21	continue 44:9
complete 34:4 63:16	conducting 23:1	continued 7:15 32:17
	conference 5:12	continues 27:21 29:16 73:15
	confident 36:9	contract 48:18,19 49:1
	confirmed 9:18	contracted 15:21
	conflicts 29:20	contracts 38:19,20
	confusion 56:14	
	connect 39:5	
	consensus 23:17	

contractual 33:9 37:22	7,12 29:24 31:11,18,24	credits 5:7 29:13 35:8,9, 13,22 40:9 51:16 56:10 57:19,25 58:8,14 59:14 64:17
contradiction 43:18	32:2,3 34:4,25 36:4,14, 17,19,23 37:3,4,8,11,13	criticism 45:11
contrary 71:3	38:15,17,23,25 39:1,4,13	criticisms 70:25
contrast 48:3	40:2,4 42:10,18 44:20	cross-subsidies 34:11
contributes 67:13	47:8,18 48:6,11,13 49:4	current 24:11 38:22 54:17 55:12
contribution 15:9,15,17, 22,25 25:14	50:16 51:6,12,21 52:12, 16,17,24,25 53:5,8,14,15	curve 13:5 51:7
contributions 26:10	54:14,19,21,22 55:16	customer 5:7 6:1,14,21 7:3,21 8:10 11:7,8,22 12:4 13:3,13 14:11,19 15:3,5,10,11,22 16:16,22 17:9,19 18:14,25 19:1,2, 6,12 21:23,25 22:13,19 26:8 28:18,24 33:20 34:1,11,14 36:16 37:5 38:6,16,20 39:3,9,16,18 44:13 47:15,21 49:5 56:14,19 57:1,8 58:5,13, 15,21 59:4,13,25 60:15, 20 64:17 66:15 70:8,24 71:8,13
control 58:1	60:17 64:18 65:22 66:1 70:7,16,19,25 71:9	customer's 11:13 14:25 19:8 36:6
controls 44:1	counsel 45:7,17	customers 6:3,9,16,18, 19 7:22 8:9 9:24 11:16 12:10 13:24 17:11 18:5, 12 19:10 20:1 22:5,15,16 24:4 25:11 26:1 28:3,6, 17,19,21,22,25 29:14 31:19 32:17,20 33:6,12, 15,19 35:12,19 37:19 42:13,19 43:9 44:22,24 46:25 47:8,18,25 48:3,6, 7,18,19 49:7,17 55:24 56:9,21 57:11,13,19 58:11,18 59:1,3,5,20 60:12,25 61:5,18 70:14 71:12,13,19,22,25 72:3,
controversies 36:25	countenance 45:2	
convenience 62:24	counterfactual 53:17	
Cool 58:23	countless 43:15 47:2 57:5	
copy 63:21	country 68:1	
copycatting 45:16	courage 46:11	
core 22:8	court 23:12 63:9	
corporate 44:6	cover 46:14	
corrected 46:16	covered 18:6 39:21 49:22	
cost 6:9,11,16 8:8,20 9:3 10:1,11,16,25 11:15 12:7,15 14:19 16:1 17:22 18:1,2,3,15 22:17,21 24:6,24 25:5 27:15,22,25 29:4 31:21,23 32:5 33:2 34:8,12,21 35:3 36:5,12 37:7,10 38:13,21 39:24 40:2 42:25 44:23 45:24 46:24 47:10,16 53:10 54:14 55:3 58:13 60:18, 19,24 61:17 71:5 72:2,21 73:22	create 6:2 18:5,10 49:2 67:1	
cost-based 10:9	created 35:10 67:4 71:7	
costs 8:22 9:6,14,15,25 10:6,11 11:23,25 12:3,21 14:21 16:11,24 18:5 19:20 22:2 26:12 28:3,4,	credit 5:25 8:24 9:4 10:23 11:1,10,21 12:12 13:23 14:8,18,21,25 16:8,25 17:7 19:19 21:22 23:1 24:1,10 29:5 33:2 34:9 36:11,16 38:2,14,24 43:6 44:12 47:24 50:20 53:12,16,20 54:13 56:6 57:12 59:12 60:19 64:15 65:1,4,6,14 66:13 67:1,9, 16,21 68:4 70:4 71:5	
	credited 51:5 54:10	
	crediting 38:16	

5,8,9,12,17,22,24 73:3, 15	deliveries 15:5	11:12,15 13:8 27:14 42:5
customers' 44:15 56:23	delivering 39:19	develop 13:22 65:19
cut 44:3 69:18	delivery 17:15 59:24	developed 36:22
<hr/>	demand 47:7,15 59:21 60:5 71:8 72:8	development 26:13 67:9
D	demands 55:19	devices 28:20
<hr/>	demonstrate 32:8 42:17 46:1 70:23	devoid 57:24
data 14:8 36:21,23,24 50:14 53:11	demonstrated 8:16	difference 17:1 24:9 36:9
Davis 25:18 45:10	demonstrates 27:13 46:12 61:12	differential 28:10
Davis's 45:13	demonstrating 41:18	differentiated 13:1
day 58:10	demonstration 38:16,22	difficult 21:22
deal 33:25	deny 10:20 61:10	diligence 40:15
dealing 20:14	Deposit 58:8	diminish 54:12
debate 60:1	depriving 44:24	direct 29:22 39:16 42:10
December 19:23 32:19, 25	deregulated 73:6	directive 31:11
decided 8:13 46:17 50:10 52:6	derived 36:11 65:20	directly 6:9 10:1,2 66:5 69:4
deciding 23:9	design 56:1 60:21	dis-remitting 11:10
decision 8:3 25:4 50:6 54:25 65:9 67:17	designed 11:1 43:13 44:7,8 56:11,15 61:2,15	disagree 67:10
decisions 33:21 35:12	desire 69:5	disagrees 12:17
decreased 71:8	detail 70:17	disconnects 49:5
deem 64:19	deter 44:8 45:1	discount 50:12
defend 43:8 45:9	determination 8:7 11:4 26:3 36:15 64:25 65:4,6, 12	discourage 59:7 72:12
defending 59:19	determine 7:20 8:24 13:5,7,22 14:8 17:16 24:6 25:6 33:2 34:6 36:3 51:2 64:16 67:25 71:25	discourages 72:20
defer 49:3	determined 36:20	discrimination 56:21
deferrable 51:3	determines 25:4 67:20	discriminatory 18:4 72:11
deferral 51:4	determining 6:17 7:9	discussed 9:19
deferred 16:14,15,21 50:23,25 55:18		discussion 18:18 20:21 62:15
defines 19:6 64:12		discussions 6:25 7:6 13:19
delivered 27:3 36:6 38:5		disincentivize 43:24

dispatch 51:15

displaced 39:3

displacement 28:11

display 46:15

disproportionate 59:24

disregard 55:9

distributed 29:24 49:16

distribution 14:24 15:18
16:6 26:11 27:1 29:25
39:1,4,15 50:16,24 70:19
71:9

diversion 69:24

Division 22:18,22 24:3,
21 25:9 27:21 28:9,18
29:13,16,22 71:1 73:24

Division's 22:21 73:18

docket 5:6 7:11,18 8:12
9:5 12:17 22:9,11,13
23:6,21 24:15 26:5 28:16
29:1,2,23 31:3,10,16
32:10 33:1,5 34:3 66:10
67:17 70:11 72:18

double 40:6 59:5

down 17:10 61:10

downward 54:13

DPU 42:4 45:6,8,10
46:14,23 47:6 48:15,23
49:1 54:1,11 56:17 58:17
61:1,9

DPU's 45:15,17,20

dramatic 17:18

drawback 49:19

drawn 25:3 29:20

drive 43:9 61:3,10

driver 10:19

driving 56:14

due 16:8 18:5 53:8

duplicitous 58:4

durable 6:2

dynamics 46:15

E

earlier 10:3,5 31:9

earn 56:10 58:18

earned 58:15

easily 10:8

easy 17:16 56:5

economic 10:16,19,21
26:13 27:8,10 34:25
35:11 51:15 53:22,24
67:8 73:2

economical 43:10

economically 13:3

economics 33:20 71:25

economy 7:2 10:20 46:8

ECR 53:2

effect 23:16,17 44:22
67:18

effective 40:9

effectively 15:20

effects 15:21 55:17

efficiency 47:18 50:19

efficient 13:3

efforts 53:17

EIM 12:5,9,10 36:21,23,
24 51:19,24

elect 18:6

electric 19:25 29:4

electricity 5:8 17:12 19:8
64:17

element 38:7

elements 73:9

elephant 35:7

eliminate 44:14

email 63:7

emailed 63:4,7

EMILY 5:20

emissions 10:12,13
34:23 53:9

emphasize 41:17

employees 28:25

employs 32:3

enacted 9:18

encourage 13:3 59:20
65:9

encouraging 42:8

end 22:12 23:3

energy 6:6,9,10,12,15,24
7:4,9 8:16 9:20 11:5,23,
25 13:2,6,7,9 17:17
19:20 22:3,7,20 24:4,18
27:3 28:7,9 33:3,15 34:2,
5,15,24 35:10,15,21
36:5,11,19,20,22 37:6,8,
10,16,20,22 38:2,5 39:9,
17,18,19 42:8 44:2,14
47:16,18,22,25 50:18
51:6,12 52:12 56:15
57:20 58:8 59:13 60:7
65:10,13,24 66:1,7
67:19,24 68:2 69:1,11
70:18 71:6,14

Energy's 66:22

engage 34:1	everyday 57:11	expended 70:15
engaged 19:13	evidence 5:24 10:10,15 17:15 19:14 23:3 24:5,23 25:1,3 29:25 41:16,24 42:15 43:16 45:5,19 46:24 47:1,9 48:4,8 49:11 54:3,16,20,23 55:4,6 58:4 60:23 61:2, 12 64:18 66:6,17 71:2 73:20	expense 6:25 54:7
enjoyed 67:6	evidencing 57:25	expensive 51:22 60:18 72:21
ensuing 22:11	evidentiary 63:6	experienced 65:19
ensuring 27:24 28:5 40:10 71:12	exact 30:6	expert 11:1 26:6 42:3 55:6 57:13 61:15
entering 33:15	examples 25:23	experts 43:1 65:19,20
entire 13:24 18:1	exceed 24:7 25:5 42:25 48:6	expiration 7:23 35:7,13
entitled 22:2 55:21	exceeds 8:8	expire 40:9
entry 59:15	exception 73:22	expired 58:8
enumerate 34:19	excerpt 64:12	explain 12:9
environmental 53:8,14	excess 34:2,14 36:5 37:6 55:11 72:10	explained 16:20 38:8 48:12 50:8 70:17
EPA 53:11	excessive 44:18	explaining 15:21
equal 24:19	excluding 9:25 27:7 66:12	explore 31:11
Equally 21:9	exclusion 66:2	export 5:7,25 8:19,24 9:3 10:23 11:10,21 12:4,6,12 13:17,22 14:7,8,18,21,25 16:7,17,23,25 17:7 19:19 21:22 23:1 24:1,10,19 26:4 28:13 29:5,12 33:2, 15 34:2,8 36:15 37:17 38:24 39:9 40:9 43:10 44:12,14 48:18 54:12 56:6 57:12 59:12 60:14 64:15,16,25 65:4,6,13 66:13,25 67:9,16,20 68:4 70:4 71:5,21 73:21
equivalence 24:13	excuse 15:14 25:17 27:1 37:9 40:3	exported 6:23,24 7:9,21 8:16 11:5 13:2,13 17:17 21:25 22:3,7 24:24 25:25 26:8 33:3 34:5,15 37:18 38:5,14 39:18 60:7 65:15,24 66:1,15,25 68:4
equivalent 24:20 39:13	exist 39:15	exporters 48:20
erosion 61:4	existence 32:8 38:22 39:2 45:24	exporting 59:13
errors 25:16	existing 32:16,18,24 33:6	
establish 5:7 16:2 34:7 64:20	exists 35:5	
established 8:11 12:21, 24 17:15 33:2	expect 16:21	
estimate 52:11 57:1,15	expects 57:11	
estimated 54:22		
evaluate 45:13		
evaluated 42:24 65:22		
evaluation 65:23		
Evans 9:21 10:17 69:2,7, 9,14		
event 17:24		
events 72:8		

exports 14:19 15:10
22:14 25:6,7,14 42:16,18
43:5 44:2,16 45:4 48:5,9,
14,22,24 49:3,12 50:1,3,
23 52:18,21 53:4,20,23
54:12,17 55:5,7,11 59:21
60:1,3,5,17 61:8,11

expressly 42:6

extent 32:4 36:3 37:13
72:22

external 27:8

externalities 27:10 34:20

extra 60:18

F

facilities 17:14 39:5,7
40:10 71:20

facilities' 12:3

facility 26:18 71:17

fact 24:7,13 37:16 48:6,
23 55:8 56:20 60:15
71:18

factor 35:5,14,16 64:24

factored 53:1

factors 26:10 67:13,14

facts 57:24

factually 25:2

failed 16:4 51:4

fails 72:7

failure 38:12 39:2

fair 6:2 17:16 20:1 21:22
22:15 27:14 29:12,15
34:13 38:4 43:20 44:15
53:16 71:12

fairly 17:8 26:20 28:3

35:19

fall 34:17,20 42:3

false 47:24

Fantastic 21:19

favor 24:15

federal 35:7

fee 17:21,24 18:2,3,16
39:22,24 59:5,6,15 72:14

fees 19:22 39:25 44:18
56:12 58:21 72:12

field 58:23 59:1

file 7:17 63:1

filed 45:10 63:14

filing 50:9 63:22

final 26:2 69:10

finally 50:6 53:22 59:17

find 25:15 31:1,2,7 43:17
48:2 72:23

finding 47:25

findings 45:15 55:8

fine 20:16

firm 33:25

fits 46:21

fixed 47:8 56:7,17

flawed 13:6 51:11

flaws 51:24

flows 6:9

focus 31:1

focusing 52:21

forced 17:11

forecast 51:8

forecasted 15:9

forecasting 12:2 52:3

foreseeable 16:22

forfeit 57:19

forfeiting 57:25

forget 33:4

form 11:22 47:14 48:24

formulae 70:21

fortunately 73:6

forum 7:7 10:14

forward 13:5,11 17:2,4,5
18:7 51:7 52:13 55:1

forward-looking 52:14

fossil 34:24 55:16

foster 67:4

found 36:8

founded 70:7

fraction 65:25

frame 33:8

frankly 46:8

free 22:19

frequently 12:13

front 56:3

fuel 26:12 34:24 52:16,
17,18 55:16

full 19:3 27:18 46:15,19
47:22 49:16 60:16

fully 28:18 38:7 39:13

function 28:5 49:18

functions 51:15

fundamentally 47:10

funds 48:20

future 11:17 13:14,16

16:22 33:3 34:1 35:15
40:14 43:24 49:8 51:9
52:10,11 53:4 54:18,22
57:1,7,17

G

galvanized 45:23
game 46:13
gave 55:1
generally 5:14 27:24
32:2,23 68:6
generate 28:19 52:10
59:14
generated 5:8 22:14 37:6
64:17 70:9,24 71:10,13
generating 22:16 36:6
48:1 53:13
generation 7:22 11:22
14:11,23,25 15:10,12,18,
23 16:16,22 17:9 19:6
22:17 25:22 26:9,11,20,
22 34:2 37:12,13,24
38:16,20 39:3,7,22 44:2
48:10,12,20,25 50:2,6
51:23 66:15 71:8
generations 22:19 29:24
generator 14:19 18:14
19:2,12 34:14 60:20
generators 6:1,4,5,14,21
7:3 8:11 9:8 12:4 13:14
15:5 17:9,19 18:25 19:1
21:23,25 33:24 34:11,12
36:16 38:6 39:16,18
47:16,21 58:14,15
geographically 49:16
giant 49:8,18
give 20:18

glide 33:10,23
goal 6:1 18:23 43:13
44:12
gold 46:10
good 5:3,20 20:1 21:20
30:23 41:11 64:5 70:2
governed 38:20
governs 65:12
gradualism 33:10,23
grandfathered 32:17,22
grandfathering 7:23
grapple 21:22
grappling 29:11
grateful 21:3,5,9
grid 6:4 7:5 11:5 12:16
17:5 22:20 24:4 28:21
36:22 43:11 44:14 49:6
51:13 55:19 59:14 60:2,
14 66:15
grid's 51:18
grids 26:11
grossly 59:23
ground 51:17
group 29:10 33:11,18,20,
24 65:18
growth 53:24 61:16 67:5
guarantee 18:13
guaranteed 52:11
guidance 31:13
guidelines 8:22

H

hand 58:15 61:6

happened 20:17 59:10
73:10
hard 41:24 43:16
harder 45:8
hardest 52:8 60:11
harmed 66:18
harmless 28:17
has-been 32:9
Hayet 37:5 46:17 50:8
Hayet's 37:8,9 38:8
63:12
HB-411 9:19
health 34:22 53:8,11,14
hear 20:11,13 21:3,16,17
29:2
heard 6:20 25:12 26:15
28:23 48:11 57:4 64:9
66:4,17 72:13
hearing 6:20 18:18 19:15
20:16,17 38:8 47:6 48:16
58:10 64:8 66:5,6,17,20
hedge 52:19
hedging 16:24 17:1,4
26:12 38:15,17,18,19
52:16,17
held 7:6 9:13 20:21 62:15
helps 70:16
herring 13:20
high 59:21 60:5
high-load 12:16
higher 28:8 29:5
highly 65:18
historic 12:4,6 36:20
historical 12:5,9,10

15:10 51:19,24 52:10	important 6:7,25 7:5,25 10:13 11:12 32:15 68:5	incorporates 16:3
hold 28:16	Importantly 25:20	incorrect 42:10,14
Holman 62:12,18,23 64:4,5 68:10,12,20,25	impose 47:17 54:18	increase 37:19 44:7 46:17,21 53:24 56:14
home 33:10,22	imposed 38:24 70:23	increased 14:13 16:8
homeowners 34:1	imposing 47:16	increasing 60:4
hope 40:16,19	impossible 57:1 71:24	incur 9:8 53:6
hour 6:16 11:7 22:1,6 24:24,25 27:2,6,10 37:11 45:19 46:19 55:7,11 56:8 61:14 70:5	improper 49:14	incurred 10:25 53:1 54:22
hourly 17:17 56:9	improperly 25:9 47:22 52:21	incurs 10:10,16 28:3
hours 6:14 12:16 15:8 22:21 24:4 26:9 50:8 51:22	imprudently 10:24	independence 46:7
household 37:20	inaccurate 27:14 52:11	independent 45:7,17
households 44:19	inappropriate 15:17	indifferent 6:5 19:10
Hunter 62:17	incense 72:20	indistinguishable 25:24
hurt 57:16	incentive 17:18 18:19,25 19:9 73:16	individual 51:2
hypocrisy 57:9	incentives 10:22 18:20 56:1 67:4	industry 7:1 10:17 35:10, 15,21 48:13 66:18 67:2, 5,18 68:5 73:5,7
hypothetical 49:9	incentivize 11:13 60:10, 12 61:16	industry-accepted 61:8
hypotheticals 41:22 49:2	inclined 47:12	inefficient 56:14 60:21
<hr/> I <hr/>	include 8:18 14:17 15:13,14 16:25 18:9 19:19 34:18 38:25 50:3	inflated 17:11
idea 54:4	included 9:14 10:7 14:24 18:18 28:7 31:22 32:6 37:2,4,14 38:13 65:23	influence 10:23
ignore 49:11	includes 18:10 53:23 65:7	informal 63:19
ignores 48:18 66:14	including 7:22 14:21,23 22:3 29:14 47:14 55:18 67:16	inherent 71:8
imbalance 36:20	inclusion 40:5	initial 59:18
impact 7:2 17:18 31:23 32:5,8 35:22 49:12 52:22 54:15 67:24	inconsistent 13:12	initially 36:21,23
implement 19:17		initiated 34:3
implemented 17:25 18:15,17		input 14:12
		inputs 36:10,12
		inquiry 31:14 34:4
		insisting 57:13
		install 6:18 11:8,14 28:21 35:12 72:3,23

installation 11:3 44:9	investigative 22:10	Keeper 58:23
installations 35:8	investment 16:11,15,21 39:4 43:24 56:16 57:8 73:4,17	keeping 29:10
installers 28:24	investments 16:6,14	key 40:13
installing 44:20 57:2	invokes 58:3	kilowatt 6:13,16 11:7 21:25 22:6 24:24,25 26:9 27:2,6,10 37:11 45:19 46:19 55:7,11 56:8 60:7 61:14 70:5
instantaneous 71:24	involves 38:19	knots 49:2
institute 42:22 55:23 56:5 58:2	IRP 52:25 53:11	knowing 57:12
instituting 56:12	irrelevant 11:4	
insufficient 41:21 55:2	irrespective 73:20	
integrated 19:20 43:25 72:2	issuance 32:21	<hr/> L <hr/>
integration 14:19,21 37:3,7,10 54:13,14,21	issue 15:19 22:1 25:20 29:12 33:24	labor-intensive 58:22
intended 19:7 59:24 67:4	issued 31:15,25	lacks 24:5
intent 9:12 30:25	issues 20:16 22:8 31:1,6 34:16,19 35:24 36:1 38:10,11 39:21 40:13,16, 17	lag 12:11
intention 57:17		Lake 24:18 69:2,16
intentionally 49:11 66:14		land 14:12
interest 10:21 21:24 29:10	<hr/> J <hr/>	landscape 67:24
interested 28:24	Jetter 21:14,15,19 30:4, 10,16,21	language 10:4
interesting 31:2	job 53:23 54:1	larded 44:18
intermittent 37:6,17	jobs 11:2 26:14 35:10 54:4,9 67:6,8	larger 65:21
interpret 8:22	July 9:5 22:24 31:15 70:11	Lastly 40:11
interpretation 10:6 64:10	jump-started 35:9	latest 36:14
interruption 62:23	justified 66:2	laudable 18:23
interveners 8:18 16:4	justifies 14:20 59:6	law 9:1 31:17
interveners' 10:9	justify 56:20	leads 34:13
intervening 69:4		leakage 54:8
intuition 41:20	<hr/> K <hr/>	leave 55:4 73:3,16
inventory 5:13	Kearns 29:3	leaving 6:5 19:10
inverter 49:9		Lee 14:1 25:12 59:11
invest 48:20 57:3,10,12		Lee's 45:11,13
		left 22:21

leftovers 15:2

legal 31:3

legally 22:2

legislative 23:19 31:11

legislature 9:17 10:5
73:6

Legislature's 9:12

lens 42:1

Levar 5:3,21 20:3,8,15,
23 21:5,11,17,20 30:4,
13,19 40:21 41:2,7,12
61:22 62:3,8,16,21 63:3,
18 64:3,5,6 68:10,15,21
69:9,13,18,23

level 11:12 12:4,6 16:13,
18 24:11 54:18

levels 54:17

levied 59:1

life 53:21

lifecycle 34:24 55:16

light 65:11

likewise 9:3 16:10 42:5
43:15 47:20

limit 9:9 23:13

limited 7:8 9:6

litigation 29:20

load 13:19,21 14:3 15:4,
8,10 25:8,10,23 26:1
28:14 36:2,7 65:21

loaded 39:13

loads 73:17

lobby 43:18

lobbyists 29:9

local 34:25

located 49:19

locks 51:15

logged 20:18

long 12:11 17:12 52:13

long-established 9:10

long-term 53:2 67:24
72:5

longer 51:14

lose 72:23

losing 73:2

loss 26:10,25 54:3

losses 14:10,12,14 19:20
37:1,3,9,10 54:1 71:6
73:23

lost 16:3

lot 19:13 47:7

low 10:18 29:10 44:12,23
59:11

low-cost 19:25

lower 38:17

lowest 52:6

loyalties 44:4

M

Macneil 15:20 43:3 52:1
60:6

Macneil's 13:15

made 22:25 29:19 35:12
39:12 40:5,14 47:7 54:24
57:4,6

maintains 19:24

major 33:7

majority 72:16

make 5:13 8:6 25:4 33:21
36:2 41:14 44:9 56:23,25
57:8 62:20 69:3 71:24
72:5,6

makes 6:17 31:7 43:25
49:24 72:2,20

making 15:5 36:17

manipulate 70:21

manipulated 51:14

manner 28:1

Margolin 41:10 61:23,25
62:19,22 63:10,25

market 12:15 13:11
16:19 28:8,9 36:20 39:10
51:9 55:16 68:1 71:15

massive 43:18

material 24:9

materialize 39:9

math 41:24 52:8

mathematical 24:12,13

matter 22:4 29:11 31:16
68:9

max 58:5

maximizes 44:1

meaning 19:10

meaningful 28:20

means 10:7 23:6 42:8

Mecham 68:23,25 69:6,
10,25 70:1

Mecham's 62:13

meet 33:8

members 6:8

memorialized 7:11

mentioned 18:19

Meredith 43:4,7,15 57:7
58:25 59:6,18,22 60:4,6,
15

Meredith's 60:13

mesh 18:11

met 42:2 70:22

meter 10:25 18:2,3,9,14
19:22 39:25 43:5 47:11,
13,14,23 55:17 59:2 60:2
72:12

metering 7:15 8:3,7,8,9,
14,17,21 9:7,15 17:24
18:16 19:5,10 22:13
24:6,10,16 25:5 31:10,
12,19 32:5,16,18,21,23
33:5,6,7,13,15,18 42:23
48:5 55:23 56:5,16
58:21,25 61:13 70:14

meters 18:10 40:1,2,3
59:4

method 13:8,18,23 14:4,
7 16:2 26:7 27:6,14,19,
22 28:11,13 50:7

methodologies 12:20
19:18 61:8

methodology 12:2,15
17:22 48:13 50:13,17
51:25 52:14

methods 11:24 13:9 14:3
26:17 51:11

Michelle 39:23

middle 48:15

Milligan 15:20,23 17:3
48:11 49:13 50:1,4 51:6,
20 52:9

Milligan's 13:4,18 15:7,
16

mind 43:14

mine 46:10

minimize 36:25

minimized 34:12

minor 73:23

minute 17:17 46:16,21

minutes 62:14

misguided 53:13

mistaken 46:11

misunderstand 8:4

model 12:8,16 17:6
51:13,15

models 26:23 51:20

modification 12:14 51:18

moments 23:4

money 27:17 52:18,19

monopoly 27:25 44:1

morning 21:6

mother 29:3

motion 63:7

Mountain 5:7,17,24
19:25 24:21 29:17,23
35:12 36:5,22 65:22,24
66:19 70:8,13,17,19,25
71:4,14,18 72:1,6,10,19
73:14,17,22

Mountain's 34:21

moving 18:7

multiple 26:6

multiyear 22:10

muted 20:8,10,22

N

narrow 7:25

narrowing 22:8

nature 31:13 33:13 48:14
50:1

Navigant 72:1

Nebraska 44:6

necessarily 31:21 58:5

needed 39:5,11 68:25

neglecting 54:25

negotiated 32:11

net 7:15 8:3,7,8,9,14,17,
21 9:7,15 19:5,24 22:12
24:6,10,15 25:5 29:18
31:10,12 32:5,16,18,20,
23 33:4,6,7,13,15,18
42:23 48:5 55:23 56:5,16
61:13

netting 17:16,18 56:9,13
59:18 71:24

network 18:11

newer 63:13

night 20:18 66:20

nighttime 51:22

noise 47:7

non-cg 28:5 29:14 42:12,
19 46:25 47:8 48:3,7
55:25 58:11 60:24 61:17

non-customer 6:5 9:7
34:11

non-generation 25:25

non-net 19:10 31:19
70:14

non-serious 59:7
non-solar 71:12
noncompetitive 27:23
nondiscriminatory 40:6
nonparticipating 22:5
28:16
nonsensically 51:21
noted 39:23
notice 33:13
noticed 63:21
notion 48:17
November 32:1,21
number 34:19 38:10 59:9
66:11,19
nurture 67:5

O

objection 63:24
obtain 46:9
OCS 12:14,23 34:10
36:8,9,12,21 37:1,11,23
38:3 40:8,11 42:3 45:7,8,
21,22 46:1,2,6,11,13,19,
23 47:7 48:16,23 49:1
54:1,11 56:18 58:17
61:1,9 63:11
OCS's 30:25 37:4 40:20
46:18 50:5,7
October 5:1,4
offer 48:24 54:3
offered 32:1 71:1
Office 24:22 35:25 71:1
official 13:5 51:7

offset 19:7 59:14
offsets 19:2
OFPC 13:7 17:3
on-site 22:20
one-year 54:25
ongoing 8:10
open 7:18 22:13 29:23
33:5
openly 51:18
operate 27:25
opportunity 5:23 22:2
53:20 69:17,21
opt 44:21
opt-out 18:5
option 18:6
oral 47:3
order 7:13,14,19 9:5,17
10:3 22:24 23:20,23
31:15,25 32:22 34:3
36:4,13 70:11
ordered 23:24
ostensible 72:4
outcome 25:21 52:4
65:17 67:23
outlandish 49:10
outlined 8:5
output 18:23 51:20
outrageous 46:13
outright 61:10
outset 6:7
outstripped 70:24
outweigh 42:18
over-allocated 28:7

over-sizing 57:24,25
overcome 73:12
overestimate 25:18
overpaying 28:6
oversimplified 15:16
overstated 37:15

P

P.M. 5:1
Pacificorp 32:3 39:10
Pacificorp's 51:7
pages 70:6
paid 8:17 29:6
panels 11:4 33:9,22
35:13 49:5,21
papers 45:14 63:13,16,
22
Paragraph 64:14
part 19:7 23:8,20,23 28:5
63:14,23,24 72:15
partial 15:3 28:10
participation 7:14
parties 7:11 11:21 14:10,
13 19:13 20:13 23:7,9,
12,18 26:5,6,14 31:13
32:10 34:16 39:12 64:9,
17 65:2 67:7 69:4 70:15,
22 71:16
party 26:15 32:5,7 41:17,
20 42:19 47:9 55:7 58:12
64:20 66:5
past 5:23 51:25
path 31:1 33:10,23 40:17
paths 44:11

pay 6:13 13:7 17:11 22:6
29:6 55:10 71:13 72:17
payback 11:3
payers 70:14
paying 22:17 29:3 44:5,
23 47:22
pays 6:12 11:8,9
PDDRR 16:2 28:13
PDF 62:25
peak 12:25 55:19
pending 12:18 18:8
penetration 16:13,19
54:17,18
people 72:16
people's 54:4
percent 15:8,9,23 32:24
37:23 46:4,5,9 50:11
perfectly 46:21 64:13
perform 26:18
performing 26:8
period 7:23,24 11:3
13:14 32:9
periods 55:19 60:5
permitted 42:6,12 49:7
perspective 8:23
phantom 58:1
phase 40:12
phone 73:11
piece 54:3
place 7:16 11:18 19:9
plan 46:13 71:21 72:2
planning 53:5

playbook 46:21
played 48:1
point 19:14 46:23 56:21
57:4,6 62:11
pointed 40:17 54:5
pointing 46:2
policies 67:7
policy 8:23 9:1 10:14
11:12 19:5
policymakers 67:3
pollution 34:22
population 13:24 49:16
portion 56:23
position 8:6 24:17 37:23
40:20 43:25 45:9,16 46:7
57:22 58:16 72:7,22
73:18,24
positions 44:7
positive 7:2
post 63:5
post-generation 39:8
posted 63:8
potential 29:24 54:1,2
72:12
power 5:7,17 7:21 24:22
29:23 34:6 35:12 60:13
65:24 70:8,9,13,17,20,
24,25 71:4,10,13,15,16,
17,18,19 72:1,6,7,10,20,
24,25 73:14,17
Power's 5:24 19:25
29:17 36:5,22 65:22
66:19 72:19 73:22
PPA 27:4,7,12 29:8
practically 23:3

precedent 73:4
precisely 49:23 52:5
predecessor 73:19
predetermine 64:24 65:1
predominantly 28:24
preliminary 5:16
premium 13:11
prepared 36:7
preparing 32:3
present 5:24 52:5 53:3
64:18 65:3,19
presentation 62:7
presented 19:15 41:16
42:15 47:9 48:4 54:20
55:5 65:24 66:9 73:20
presenting 5:15
presently 53:1
prevent 57:23
price 13:5,12 17:2,4,12
51:7 55:17 59:19,25
prices 12:5,9,10 13:11
17:5 51:9,20,25 52:10
primarily 19:7
primary 8:5 66:22
principal 72:3
principles 55:25
prior 22:10 33:14 66:5
prioritized 15:1
private 23:6,7,9
problem 58:1
problems 58:19
proceeding 7:8,20 8:1,5,
25 10:7 11:19 12:23

13:20 14:13 18:21 22:23
23:1,14,25 25:2 31:9
32:11,22 34:17 38:11
40:12 41:14 43:2 45:3,23
46:3 57:14 64:9,10,13,15
65:2,4,13 67:8,10,23
70:3 71:16 73:18
proceedings 73:19
process 12:21 22:10
27:23 40:13
procured 6:15
produce 7:4 52:11 57:20
60:8,13 72:25
produced 14:4
producing 71:19
production 19:3 25:18
60:3
profile 13:22 14:9 16:18
25:22
profiles 36:9
profit 44:1
profits 44:3
profound 67:18
program 7:15,16 8:8,9,
10 9:7,16,23 17:23 18:15
22:13 24:16 38:18,19
42:23 48:6 52:17 55:23
59:15 72:15
programs 50:19 58:22
prohibitive 72:21
project 50:22,25 51:2,3
projecting 53:5
projections 52:24
projects 54:6
promote 68:6

proof 38:12 39:2 64:20
proper 56:1 58:1
properly 15:11 42:20
43:6
proposal 8:15 12:17,19
13:4 14:16 18:1,8 19:4
29:18 37:2 43:23 44:8
56:4,11 61:20 65:25
66:19 72:19
proposals 10:9 56:13
59:19,23
propose 8:18 16:7 26:7
57:18 58:7
proposed 6:14 11:23
12:14,22,23 13:10,18
15:17 17:3,21 18:7,24
19:2,18,21 26:4,21 29:17
41:18 42:4,16 43:8 45:4
46:3 54:14 58:19 61:13
71:23 73:24
proposes 43:17 44:12,17
56:17,24 58:20 59:12,17
61:1 71:18 72:11
proposing 41:17 58:14
proposition 52:16
protect 61:4
protected 28:6 33:7
proven 64:22
provide 5:18 6:4,21
10:17 19:25 24:22,24
27:16 28:20 36:1 39:16
41:22 56:1 57:20 60:2,3
61:11 72:24
provided 31:12 33:12
35:11 45:19 63:8,12
providing 59:19
proving 53:20

provision 32:23
provisions 32:18
proxy 28:10,13
prudent 27:25
PSC 22:25 38:18
PSC@UTAH.GOV 63:5
public 5:5 6:8 19:4 21:24
23:11 28:23 57:5 66:20
punitive 56:12 59:5 61:2
purchase 57:8 71:15
purchases 22:3 24:5
purchasing 47:16
purely 44:7 61:3
PURPA 44:25
purportedly 6:21
purpose 22:9 23:25
purposes 32:4 63:6
pursuing 40:16
purview 10:22 35:1
push 46:14
pushed 45:8
put 7:16 28:15 44:8

Q

QF 49:19,23 71:17
QFS 44:23 49:25
qualification 28:1
qualified 41:25
qualifying 12:3 17:14
71:17,19
quality 24:12 53:20

quantifiable 7:5 8:19
9:14,24 16:12 64:18
70:12

quantified 53:19 55:20
61:7 70:5

quantify 16:9,13 50:6
54:2 59:8 70:16

quantifying 42:16

question 20:24 22:4,9,23
39:14 42:20,24 53:18

questioned 39:23

questioning 45:18

questions 20:5,6,7 21:2,
7,10 30:9,11,15,17
40:23,25 41:4,5 61:25
62:1,5,6,9 68:11,18,19

quick 20:19 62:20

quote 22:25 23:3

R

raised 34:16 38:10 54:1,
24

range 65:22

rate 5:25 6:17 7:21 8:17,
24 9:4 11:1,10,16 12:13,
18 14:21,25 17:7 18:8,24
19:3 23:1 24:1,10,12,19,
20 26:4 28:8 29:12,15
32:18,23 33:2,13,14,17
34:9,13 36:11,16 38:2,4,
7,14,24 39:14 40:2
41:17,18 42:4,6,24
43:16,19 44:4,16,17,23,
24 45:4,18 46:4,5,9,18,
19 52:6,10,13 53:2
54:13,25 56:1,3,6,7,15,
17,18,22,23,24 57:11,15,
16 58:19 59:12,17,24

60:12,25 61:4,13 64:16
65:6,14 66:13,16 67:14,
15,16,21 68:4 70:4,14
71:5,21 73:21

ratemaking 32:4

ratepayers 9:9,25 31:20
42:13 58:9

rates 9:2,22 10:18,23
11:21 13:1,23 14:18
16:8,25 19:19 23:13 28:8
29:10,11 32:24 33:8 34:7
35:2 40:5 43:8,9,13
47:22 55:12 56:12,25
57:18

re-evaluated 18:17

reach 15:8 27:18

reached 7:10

reacting 31:11

read 64:15

readers 10:25

reading 64:11

ready 62:18

real 41:25

reality 48:19

realized 32:9 68:23

reason 27:15 72:3,4

reasonable 18:15 21:24
22:5,14 25:2 34:7 35:2
36:15 38:4 41:19 42:6
43:21 44:16 64:16 65:7,
17 66:16 67:13,20

reasons 37:21

rebutted 15:20 55:8

recall 45:25

receive 7:3 9:8 11:17
15:6 53:12 57:20

received 15:2 19:23 26:6
59:8 63:21

recent 36:20

recently 43:11

recess 62:13

recognition 37:12

recognize 36:18 71:7,16
72:7

recognized 34:21 37:25

recognizing 51:23

recommend 24:18 29:16

recommendation 23:17
37:5 66:23 70:5,10

recommended 70:4 71:4

recommends 29:22 38:4
67:19

record 20:21 24:6,23
25:1,8,15,21 28:15 30:1
31:2 57:24 60:23,25 61:6
62:15 63:15,17,23,24

recover 22:2

recovered 40:3

recovery 40:1,5,6

rectify 35:18

red 13:20

redeliver 39:17

redesign 56:24

reduce 47:19 52:18

reduced 10:12 14:12
34:22,23 37:19 47:7,15
53:9 55:19

reduces 15:22 72:8

reduction 16:7 37:4
53:17

reference 26:19	relying 51:24 52:9	resets 56:18
referred 16:11 52:1	remain 29:18 47:4	resetting 56:25
refinements 40:14	remained 22:18	residential 24:11,20,25 32:24 59:13 72:17
reflect 13:2,11 43:14	remaining 43:2	resiliency 55:16
reflective 55:25	remains 68:1	resilient 49:25
reflects 17:1 61:6	remarks 41:15 63:1	resolution 31:8 40:18
refuse 43:5 71:7	remember 6:8	resolve 31:2
refuses 50:20	remove 10:8	resolved 36:2 40:13
refusing 52:20	removed 12:16	resource 27:22 37:6 70:9 72:2
regard 34:10	renewable 9:19,23 18:23 54:6	resourcement 13:16
regression 14:5	reopen 22:23	resources 16:3 26:22 51:16,17 65:9 70:16
regulated 34:7 35:3	reopened 8:9	respect 16:1 17:19 25:10 33:25 37:1
regulates 35:18	repeat 58:12 69:19	respectfully 61:19 67:10
regulators 27:24 28:2	reporter 62:25 63:9	response 52:25
regulatory 35:20	represent 66:24 68:3	responsibility 35:6,17,20
reinstated 8:21	representatives 29:1	responsible 22:17
reiterate 66:6	representing 69:10	restrict 28:1
reject 16:5,10	reprogram 18:3	result 7:10 14:6 16:14 17:12 22:10 32:7 55:24 65:16 66:16 67:7 73:13
rejected 8:15	request 63:11,19 69:17, 21	resulted 25:13
related 10:16 33:21	requests 19:15 62:20	results 14:1,2,4 25:9,17 26:20 28:15,16 30:7 38:1 51:18,21 70:18,22
relates 16:16 33:21	require 13:21 14:5 58:23 59:2 60:17	retail 8:17 19:3 24:12,19, 25 55:12 56:6
relationship 15:11	requirement 19:8 28:11	retain 10:25 57:13
relative 35:22	requirements 15:3,4 31:3	retained 65:18
relevant 6:23 8:23 13:25 64:19	requires 31:17 41:24 44:25 50:15	retreated 51:24
reliability 50:14 55:15	research 13:19,21 14:3 25:8,11,23 26:2 28:15 36:2,7 65:21	return 46:4,5,9 57:11,15
reliable 13:8 54:23 61:15	reset 56:22	
relied 41:20 49:3 53:9		
relief 60:2		
relies 47:23		
rely 24:4 37:22 51:9 52:14 54:25 55:2		

62:12,14
returning 24:15
revenue 28:11 44:7
53:24 67:6
reverse 35:17 52:3
review 12:22 22:24 25:15
29:19
reviewed 36:8
reviewing 32:12
revised 14:15 50:9
revisit 8:3,13
riders 56:22
rightfully 56:10 58:15,18
rigorous 42:2
risk 73:2
risk-free 46:9 57:10
risks 37:17
RMP 14:2 36:6,7 38:6
39:3,19,25 42:3,10
43:17,19,22,25 44:5,6,8,
11,14,17,22 45:1,9,16,22
46:2,8,10,14,20,23 47:6,
17,24,25 48:15,22,23,25
49:1,7 50:17,20,23 51:9,
11,12,14,15,19,24 52:6,
17,18,19 53:3,5,12,13,
15,16,25 54:11,20,24
55:1,10 56:17,20,24
57:9,16,17,21 58:3,7,20,
23 59:3,8,12,17 60:2,8,9,
11,19 61:1,4,9 71:23
72:11,23 73:2
RMP's 38:19 39:22 43:8
44:4 45:2,4,9 46:3,12,21
51:13 52:24,25 53:9
54:5,14 56:3,11,15 58:19
61:3 71:21 72:8

robust 65:21
Rocky 5:6,17,24 19:24
24:21 29:17,23 34:21
35:11 36:4,21 65:22,24
66:18 70:8,13,16,19,25
71:4,14,18 72:1,6,9,19
73:14,16,21
role 9:11 48:1
rolls 59:3
rooftop 6:18 7:1 11:14
16:13 28:19,25 29:4
35:8,13 67:2,5,18 68:1
70:16
rooftops 47:1
room 35:7
roots 31:9
ruling 8:2
running 55:24
runs 73:2
Ryan 9:20

S

sales 44:2
salesman 58:5
Salt 24:18 69:2,16
sample 13:21 25:11
65:21
satisfying 38:12
saving 52:19
savings 27:1 72:2
say-so 41:19
scale 15:24 26:18 27:4,7
29:8
scenario 56:8

scenarios 49:9
Schedule 13:24 19:2,17,
22 26:1 29:18 67:16
schedules 19:1
science 41:25
scope 7:8 8:1,4 11:18
18:21 23:13 31:13 34:17
64:10,13 65:11 67:9
scrutinized 37:14
secondary 37:2
sector 35:11
seek 47:17 54:11
seeks 44:22
sees 35:18
seize 53:19
sell 49:7 72:10
send 59:24 62:25
sense 31:7 43:25
sentiment 66:21
separately 24:3
September 7:12
serves 15:4
service 5:5 8:20 9:3 10:1
18:6 20:1 23:11 24:25
29:4 31:24 32:4 34:8,21
35:3 36:5 39:16 50:25
services 22:20 24:22
55:15
set 19:5 23:1,13 24:11
33:25 56:5,7 71:5 73:21
sets 25:9
setting 23:25 24:19
29:12 35:2 53:2 60:12
71:22

settlement 8:11 22:11
23:5,10,16,19,22 32:11,
13,15 64:12,14,23 65:1

sew 56:11

shape 51:20 67:24

shareholders 44:6

shift 45:24 46:24 47:8,10
59:20 60:24

shifting 43:22 58:13

short 42:4 62:12

shorter 33:18

shortsighted 72:22

shouted 47:1

show 20:10

showing 8:2 49:2

shows 25:21

sign 23:12

signal 60:16,21

signals 59:20,25

significant 18:18 25:13
35:14 66:2 70:15

significantly 27:17

similar 14:4 15:3 26:1
38:20 53:12 71:14

similarly 11:4,16 18:4
24:17 27:5 33:23 41:22
53:7 65:5

simple 24:12 48:17 52:16
56:4

simpler 12:9 14:5

simply 26:21 34:25 48:25
60:20

single 29:3 46:22 49:15,
19,23 50:22,24 52:22

54:3

sizes 58:2

sizing 40:10

slightly 71:6

small 36:9 44:19 56:23
65:25

Snarr 30:22,23 40:21,24
41:6 45:25 63:11,19,20,
21,25 64:2

so-called 54:13

social 26:12 53:10

solar 6:14,18 7:1 8:4
9:20 10:17 11:2,4,14
15:21,25 16:13,18 24:2,
14 26:18 27:4,7,12
28:19,24,25 29:5,8 33:9,
22,24 34:5,14,24 35:8,9,
10,13,15,20,21 36:8
37:16,17,25 39:17,22
40:10 41:9,15 42:2,15
43:14 44:21 45:1 48:4,14
49:21,24 50:5,11 51:23
53:16 54:2,4,15,23 55:5
56:2 57:2 58:4,6 60:18
61:7,16,19 65:18,24
66:1,18 67:2,5,18 68:1
69:1,11 70:3,15,16 72:3,
21

Solar's 8:14 37:2 42:20,
25 45:8 55:8,13,22 56:4
61:13,20 65:14 66:8,12,
23 68:2 70:10

solely 16:17 70:7,13

solution 6:2 7:10

sort 7:3 63:13 73:5

sound 21:3

source 6:6

sources 37:23

speak 41:16

special 29:9

specific 10:11 11:20
17:15 35:3 38:19 52:4

specifically 19:16 48:10

Specifics 38:6

specter 54:1

spite 72:13

spot 49:20

spread 49:18

stability 67:1

stack 26:24

stacked 26:7,16 27:13,19

stand 50:10

standard 46:12 50:14
65:5,7,11

start 64:11

Starting 48:10

starts 52:4

state 7:2 10:21 11:13
33:4 35:8 42:7 49:18
54:7,10 67:6,12,15 68:6

stated 7:17 9:9 13:15

statement 18:20 30:2
66:7

statements 5:19 21:13
30:21 41:8 47:4 61:23
62:10,13 68:7,24 69:3

states 9:22 31:16 54:7
58:3 67:25

statute 8:14 19:5 42:7

step 61:7,9

Steward 43:4 58:10	46:24 47:2 48:3 55:24	supports 28:9,18 37:12
Steward's 42:9	58:11,13 60:24	40:11 50:5
stipulation 7:11,19 23:2, 5,10,12,15,17,20,22 32:11,13,16 64:12,14,23 65:1	substantial 24:23 42:15 48:20 55:6,17 61:17 71:2	supposed 47:9
stop 17:2 56:15	substantially 33:8	supposedly 47:8 57:23
storage 28:20 60:17 72:20,23 73:1	substantive 40:13	Surely 47:17
straightforward 13:25	substitute 26:20,22	surrebuttal 43:12 46:17 50:9 70:6
stranded 73:4,17	substituting 26:17	sustainable 22:15
strata 25:10,14,17	substitution 27:4	system 6:24 7:22 11:8,17 13:2 18:10 19:6 29:25 39:4,6,15 47:15 49:15 52:22 57:23,25 58:2 59:21 60:6 71:25 72:3,21 73:16
strategic 54:24	substitutions 27:20	systems 39:6 48:21 49:17 60:18
strategy 54:6	sudden 50:5	
streaming 21:15	sufficient 30:1 59:14	
strings 41:22	suggested 24:2 36:24 38:13 45:17	
structure 8:10 26:4 42:24 43:17 44:17 45:5 56:4,15 58:20 61:1	suggestion 47:15,20	
studies 32:4,6 36:7,8	suggestions 39:12	
study 13:19 14:3 25:8,23 26:2 28:15 29:23 32:7 36:2,11 54:15 65:21 72:1	suggests 37:7	
subject 23:2 28:1 29:19 56:19 58:21	sum 25:16	
submit 64:21	summary 67:22	
submits 34:10 36:12	sunniest 67:25	
submitted 32:12	superceded 73:10	
submitting 46:16	supplement 32:6	
Subsection 31:17,22	supplies 18:11	
subside 29:4	support 23:10 27:21 29:10 41:23 43:16 45:18 56:18 61:2 68:5 72:18	
subsidies 18:20	supportable 26:21	
subsidize 48:7	supported 25:2 36:21 37:2,5 45:5 46:4,18 58:17 61:15 63:13	
subsidy 42:19 45:24	supporting 16:14 23:18 46:10 54:3	
	supportive 66:7	
		<hr/> T <hr/>
		T&d 51:2 55:18
		tailor-made 43:23
		takes 14:18 17:4 44:6
		taking 26:25 46:7 49:25 50:9
		talked 43:7 68:24
		talking 39:25
		taps 7:14
		tariff 39:14
		task 21:22
		tax 35:8,9,22 53:24 67:6
		tear 16:8,9
		technique 52:3
		technology 11:17 73:10
		telecommunications 73:5,7

telling 43:8,12 46:22
ten 62:13
term 17:12 33:14,17
52:13
terms 23:2 63:3 66:10
territory 50:25 61:3
test 32:9 70:22
testified 14:1 49:14
51:21 52:9 54:9
testimony 11:6 13:15
24:21 26:6 38:8 39:23
43:2,22 45:7,10 46:17
47:3 48:11 50:9 57:6
59:18 63:12 67:23 70:7
thick 57:9
thing 30:7 73:5
things 34:20
third-party 27:8
Thomas 69:2,7,15,16,19,
20
thought 50:12 52:7 73:7
thoughts 69:11
thousands 67:6
tidal 73:11
time 14:20 22:12 23:4
29:20 30:3,8 33:8 38:13
40:19 41:13 44:24 56:13
59:17 61:21 69:1
times 43:16 57:5 59:21
timing 25:6,24 28:14
today 21:4 30:5,25 41:15
72:15
tool 40:10
top 15:8 51:19 60:18

total 25:14,18 27:11
TOU 43:8
touchstone 8:1
tour 31:5
tracks 56:16
traditional 34:6 39:6
transformers 37:3
transition 7:16,23 17:23
32:20 33:12 43:19 72:15
transmission 14:24
15:18 16:6 26:11,25
39:1,4,5,11,13 50:15,24
70:19 71:9
transparent 36:25
treat 44:22 71:18 73:15
treated 35:19 63:5
treatment 72:5
treats 17:14
tremendous 46:20
trots 51:11
trouble 51:13
true 22:18 23:7 34:12
47:20 49:17 50:2 55:6
61:14
true-ups 29:19
trued-up 6:11
Tuesday 5:4
turn 11:20 48:8 56:3
turning 14:10,22
twist 49:2
type 15:19 26:19 66:11
typically 48:21

U

ultimately 22:6,16
un-rebutted 48:4
unable 44:20 45:6
uncertain 14:20 44:18
57:16
uncertainty 56:11
underestimate 25:19
underestimation 25:13
understand 49:17 56:5
understanding 9:18
understands 12:8
unexpectedly 37:19
unneeded 10:25
unprincipled 50:8
unquantified 47:23
unrealistic 41:22
unregulated 35:20
unscientific 50:13
unsubstantiated 41:19
47:5
unsuccessfully 61:10
unsupported 45:23
49:10 50:13
unsustainable 22:12
untenable 44:9
unused 40:8 57:19
up 17:10 32:21 44:18
46:6 56:23 63:6
update 12:12 17:8
updated 17:7 38:24
57:18

updates 40:14

updating 36:12

upgrading 18:9

usage 17:19 18:22

users 39:18

Utah 9:1,20 10:17,19
15:8 16:19 18:11 20:1
24:17 42:7 43:24 44:5,10
45:2 49:21 53:21,23
54:10 56:2 65:8,13,17
66:7,22 67:3,12,15,19
68:2,6 69:1,11 73:6

Utah's 54:7 66:18 67:24

utilities 10:18 27:4,25
35:18

utility 9:2 15:24 21:24
22:1,6 26:18 27:7 28:3,
22 29:7 31:18,20 34:2
35:4 39:6 70:7

utility's 31:24 34:8

utility-based 65:14
66:12,24 68:3

V

valid 14:6

valuable 43:11 60:2
61:16

valuation 26:7,16,24
27:14,19 45:4 55:23
66:25

valuations 26:21 48:9

valued 22:14

values 26:13,14,17,25
37:24

valuing 27:22

variable 48:14 49:24

Variations 25:24

variety 26:9 28:23

vary 14:20 26:5

vast 72:15,16

versa 42:25

vertically 43:25

viable 68:1

vice 42:25

video 69:8

virtually 46:9 57:10
73:12

visit 58:24

vital 6:17 10:21

Vivint 37:25 70:3,10

Vivint's 36:24

voice 21:4

voided 13:6

Volkmann 14:15 16:12
50:17 51:5

volume 13:12 20:16,19

volumes 13:13 28:14

Vote 6:14 8:4,14 24:2,14
36:8 37:2,25 41:9,15
42:1,15,20,25 45:8 48:3
50:5,11 53:15 54:23
55:5,8,13,22 56:4 61:7,
12,19,20 65:14,18 66:8,
12,23 68:2

W

Wagener 20:3

walk 26:16 31:6

wanted 69:3

water 45:21

waterfront 39:21

Wattsmart 58:23

wave 73:11

wear 16:8,9

website 63:5,8

week 5:24 68:24

Wegener 5:18,20 20:5,
16,24 21:8,13 72:13

weighted 18:2,15 25:16

weighting 25:10,16

well-being 42:7 65:8
67:12 68:6

well-established 28:10

wholesale 29:7 56:24

wide 28:23

widely 26:5

win 46:20

win-win-win 7:10

wire 73:8,12

witnesses 26:15 42:1,3
43:17 45:9,10,20 48:23
66:4

words 60:13

work 19:14 42:2 45:12,
13,14 52:8 63:13,16,22
64:1

works 52:4

Worley 11:6 36:24 49:13

Worley's 26:24 70:6

worry 35:2

worse 19:11 71:19

worth 23:4

would-be 32:8

written 47:3

Y

Yang 50:17 51:5

year 13:9 56:24

years 29:21 33:14,25
43:20 48:21 51:25 58:14
59:13 67:3 71:23 73:20

yesterday 57:5