

- BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

Application of Rocky Mountain Power to Establish Export Credits for Customer Generated Electricity	<u>DOCKET NO. 17-035-61</u> <u>ORDER APPROVING TARIFF REVISIONS WITH CORRECTION</u>
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ISSUED: November 25, 2020

In compliance with the order we issued in this docket on October 30, 2020, Rocky Mountain Power (RMP) filed proposed tariff revisions on November 10, 2020. The Division of Public Utilities (DPU) filed an action request response on November 18, 2020, and RMP, Utah Clean Energy (UCE), and the Utah Solar Energy Association (“Utah SEA”) filed comments on the DPU’s action request response. After considering all the comments filed, we approve RMP’s tariff revisions with one correction.

We conclude that RMP’s inclusion of batteries within Schedule 37’s definition of “Renewable Generating Facility” is consistent both with RMP’s testimony filed in this docket and with our order issued on September 30, 2020, in Docket No. 20-035-T07, *Rocky Mountain Power’s Proposed Tariff Revisions to Electric Service Schedule No 114, Load Management Program*. While our October 30, 2020 order did not specifically address batteries, it also did not disapprove or modify that aspect of RMP’s filed testimony. Including batteries within this definition does not preclude future consideration of whether a rate structure more specific to batteries might be appropriate.

We conclude that RMP’s definition of “Exported Customer-Generated Energy” is consistent with our October 30, 2020 order in which the second ordering paragraph states: “Schedule 137 customers’ excess generation will be netted monthly in connection with billing for RMP-supplied energy.” We conclude and clarify that we did not approve instantaneous

netting; we did not articulate an approval of that type of netting and it would be inappropriate considering our disapproval of RMP's proposed metering fee. While UCE's proposed additional language, "as netted with on-site energy consumption on a monthly basis" is an attempt to clarify the tariff language, the monthly billing adjustment is described in other locations in RMP's tariff revisions. We conclude that a description of the monthly billing adjustments is not necessary or appropriate in the definition of "Exported Customer-Generated Energy" and we approve RMP's proposed tariff language without revision.

It is unclear whether RMP's exclusion of power charges in the tariff statement that the "credit value in dollars computed for the Exported Customer-Generated Energy will be applied against the Energy Charges on the Customer's monthly bill" is a typographical error or RMP's interpretation of our October 30, 2020 order. In either event, we conclude that our order did not dictate or contemplate this result. References in our order to netting generation against energy supplied by RMP did not parse the difference between the power and energy charges. RMP's original application and direct testimony also indicate an intention to apply the export credit against both power and energy charges. Our order did not direct any change to that concept. Accordingly, we direct RMP to file tariff revisions reflecting that export credits will be applied monthly against power and energy charges.

We conclude that it is not necessary to address annual updates in the tariff language. We have not yet established the timing and process for those updates, and they are likely to result in tariff revisions each year. At this point, describing a potential future process whose parameters have not yet been defined is as likely to be confusing to customers as it is to be helpful. After we

establish more specific guidelines for annual updates, we can address whether those guidelines should be included in tariff language.

With respect to Utah SEA's request for clarification on how it should comply with Utah Code Ann. § 13-52-202, we conclude that the electricity rates intended to be offset by customer generation can be impacted by dockets including rate cases, Energy Balancing Account cases, and demand-side management updates. Annual updates to the export credit rate will fit within that paradigm.

ORDER

We approve the tariff revisions filed in this docket by RMP on November 10, 2020. We direct RMP to file an additional revision to indicate that export credits will be applied against the power and energy charges on the customer's monthly bill.

DATED at Salt Lake City, Utah, November 25, 2020.

/s/ Thad LeVar, Chair

/s/ David R. Clark, Commissioner

/s/ Ron Allen, Commissioner

Attest:

/s/ Gary L. Widerburg
PSC Secretary
DW#316582

CERTIFICATE OF SERVICE

I CERTIFY that on November 25, 2020, a true and correct copy of the foregoing was delivered upon the following as indicated below:

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