

November 30, 2020

VIA ELECTRONIC FILING

Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Administrator

RE: Docket No. 17-035-61—In the Matter of the Application of Rocky Mountain Power to Establish Export Credits for Customer Generated Electricity

Pursuant to §§ 63G-4-301(1) and 54-7-15(2)(a), PacifiCorp d/b/a Rocky Mountain Power (“RMP” or the “Company”) hereby submits its Motion for Clarification and Alternatively Petition for Rehearing concerning the Utah Public Service Commission’s (“Commission”) October 30, 2020 Order and November 25, 2020 Order Approving Tariff Revisions with Correction, both in the above-captioned docket (“Export Credit Docket”).

Rocky Mountain Power respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

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Sincerely,


Joelle Steward
Vice President, Regulation

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

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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power to Establish Export Credits for Customer Generated Electricity	Docket No. 17-035-61 MOTION FOR CLARIFICATION AND ALTERNATIVELY PETITION FOR REHEARING
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Pursuant to §§ 63G-4-301(1) and 54-7-15(2)(a), PacifiCorp d/b/a Rocky Mountain Power (“RMP” or the “Company”) hereby submits its Motion for Clarification and Alternatively Petition for Rehearing concerning the Utah Public Service Commission’s (“Commission”) October 30, 2020 Order and November 25, 2020 Order Approving Tariff Revisions with Correction, both in the above-captioned docket (“Export Credit Docket”). The Company requests that the Commission clarify its orders concerning the netting of customer generated electricity. If the intent of the Commission’s order is to net usage and exported energy monthly, the Company requests rehearing on that issue.

BACKGROUND

1. On October 30, 2020, the Commission issued a final order in the Export Credit Docket. Relevant to this Motion, the Order:

- a. “[A]pproved netting a customer’s [Export Credit Rate] value earned against energy costs incurred on the customer’s monthly bill.” The Commission went on to say that “[H]ourly netting (or any netting interval)

simply does not have a basis or justification in a cost of service setting. . . . Cost of service principles dictate that Schedule 137 customers should receive the ECR for each kWh they actually export to the grid.” Order at 19.

- b. “[D]ecline[d] to return to a ‘kWh for kWh’ netting regime for Schedule 137.”
- c. Ordered that “Schedule 137 customers’ excess generation will be netted monthly in connection with billing for RMP-supplied energy.”
- d. Ordered the Company to “file revised tariff sheets to implement this order.”

2. The Company submitted a compliance filing with revised tariff sheets on November 10, 2020. The tariff defines “Exported Customer-Generated Energy” to mean “the amount of customer-generated Energy in excess of the customer’s on-site consumption that is exported to the grid.” The compliance filing also included the following special conditions:

- a. Energy Charges in the applicable standard service tariff shall be computed from the total purchased Energy for the billing period. (Special Condition 2)
- b. 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. Excess credits will carry-over to the next monthly bill during the Annualized Billing Period. (Special Condition 3)

3. The Commission solicited and received comments on the Company’s compliance filing.

4. Utah Clean Energy (“UCE”) submitted comments questioning the Company’s definition of “Exported Customer-Generated Energy” because, unlike Schedule 136, it did not specify a netting interval. UCE further stated, “Based on the Commission’s order, it is not clear whether the Commission intends for customer generation to be netted against energy purchased from the utility at the time of a customer’s monthly billing cycle, or whether the Commission intends to adopt RMP’s proposal for ‘instantaneous’ netting over an interval of one second.” UCE Comments at 2.

5. UCE’s comments further stated its interpretation that “references to ‘netting’ in the Commission’s order as pertaining to the netting of kilowatt-hours generated against kilowatt-hours purchased from the utility for the purposes of determining the customer’s accrual of Export credits rather than netting of the monetary value of the credits a customer has earned against the expenses on their bill.” Id. at 3. UCE asked the Commission to clarify its ruling on this issue and adjust the definition of “Exported Customer-Generated Energy” accordingly. Id. at 4.

6. Utah Solar Energy Association (“USEA”) supported UCE’s comments relating to the definition “Exported Customer-Generated Energy.” USEA Comments at 3.

7. On November 25, 2020, the Commission issued an order accepting the Company’s tariff revisions, with a correction not related to the definition of “Exported Customer-Generated Energy. The Commission accepted the definition as consistent with its Order, which stated that “Schedule 137 customers’ excess generation will be netted monthly in connection with billing for RMP-supplied energy.” It further ruled:

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 revisions

8. The Company believes that the Order and the Order Accepting Tariff Revisions with Correction intended to accept the Company’s proposal not to net energy exported to the grid and energy delivered from the Company. In the Direct Testimony of Robert M. Meredith, lines 101-105, Mr. Meredith stated that under the Company’s proposal:

The energy exported to the grid and energy delivered from the Company would not be netted against each other over an interval period. Customers’ billings would be based upon total energy exported and total energy delivered for each monthly billing cycle. These energy measurements would be computed in real time and would not rely upon a specific interval period such as a 15 minute or hourly interval.

The Company is seeking this formal clarification in the record in order to remove any further confusion or misunderstanding that could be inferred from the Commission’s statement in its November 25, 2020 order that it did not approve instantaneous netting since “instantaneous netting” was how the Company’s proposal for no interval netting was characterized by certain parties in the proceeding.

ARGUMENT

The Company believes the Commission’s Order and the language in the approved Schedule 137 is clear. The Company should measure and bill the customer for all energy delivered to the customer during a month. The Company should also measure all electricity exported by the customer and provide a monetary credit to the customer for that energy. The Company should not net the amount of energy delivered and the amount of energy exported before calculating the amount a customer will be charged for the amount of energy received or the credit for energy exported. Rather, the Company will net the value of the exports against the energy and power charges. Calculating energy delivered and exported in this manner will not require any additional metering cost over and above traditional net metering, as testified by Mr. Meredith at the hearing in this matter. This interpretation is supported by the Order, Order

Approving Tariff Revisions with Correction, and the facts set forth in the background section, and the Company does not believe that Schedule 137 needs any additional language clarifying this interpretation.

However, the issue of netting is of paramount importance to the Company because kWh for kWh netting results in a significant cost shift regardless of what export credit is applied to the exported energy. If the quantity of energy exported and the quantity of energy delivered were netted over a monthly interval the result would not be materially different than net metering. UCE and USEA's interpretation of the Order and the Company's Schedule 137 are concerning. UCE states that its interpretation of the Order is that kWh exported will be netted against kWh delivered on a monthly basis, rather than the netting of the monetary value of credits. UCE Comments at 3. This interpretation is not supported by the Order, which specifically rejects a return to a kWh for kWh netting regime. The Company requests that the Commission specifically clarify that UCE's interpretation is not in line with the Order.

If the Commission believes UCE's interpretation to be correct, the Company requests rehearing on the issue of netting and requests that the Commission rule that Company should, on a monthly basis, calculate the monetary value of energy delivered and the monetary value of energy exported and net those amounts to arrive at a monthly bill.

CONCLUSION

For the foregoing reasons, the Company respectfully requests that the Commission clarify its orders concerning the netting of customer generated electricity. If the intent of the Commission's order is to net usage and exported energy monthly, with the ECR applied to excess exported energy, the Company requests rehearing on that issue.

RESPECTFULLY SUBMITTED this November 30, 2020.

ROCKY MOUNTAIN POWER



Emily Wegener
Rocky Mountain Power

Attorney for Rocky Mountain Power

CERTIFICATE OF SERVICE

I hereby certify that on November 30, 2020, a true and correct copy of Rocky Mountain Power's **MOTION FOR CLARIFICATION AND ALTERNATIVELY PETITION FOR REHEARING** in Docket No. 17-035-61 was served by email on the following Parties:

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