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Application of Rocky Mountain Power to Establish Export Credits for Customer Generated Electricity	<u>DOCKET NO. 17-035-61</u> <u>ORDER APPROVING ANNUAL EXPORT CREDIT RATE UPDATE PROCEDURES</u>
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ISSUED: August 11, 2021

**I. BACKGROUND AND PROCEDURAL HISTORY**

On October 30, 2020, we issued an Order (“October Order”) approving an export credit rate (ECR) and other modifications to Rocky Mountain Power’s (RMP) proposed Electric Service Schedule No. 137, Net Billing Service (“Schedule 137”).<sup>1</sup> In the October Order, we found it was just and reasonable to update the ECR annually and we invited comments and reply comments on the potential timing, procedure, and scope of annual updates to Schedule 137 (“Annual Update”). On January 26, 2021, RMP filed an unopposed motion to extend this comment period that we granted on February 2, 2021.

On April 28, 2021, we issued an Order on Agency Rehearing (“April Order”) and a Notice of Comment Period that re-established a comment period for the potential timing, procedure, and scope of the Annual Update. On June 8, 2021, RMP, the Division of Public Utilities (DPU), the Office of Consumer Services (OCS), and Utah Clean Energy (UCE) filed comments. On June 29, 2021, RMP, DPU, UCE, and Vote Solar (Vote) submitted reply comments.

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<sup>1</sup> Schedule 137 sets forth RMP’s Net Billing Program including the amount and conditions under which RMP grants a bill credit to customer generators for the energy that they export to RMP’s grid.

## **II. PARTIES' COMMENTS**

The commenting parties generally agree on various proposals related to procedural and substantive aspects of the Annual Update. We summarize parties' positions below in terms of the timing, content, procedure, and scope.

**A. Filing and Effective Dates:** RMP proposes an Annual Update filing on or around October 15 that incorporates updated data from the 12-month period ended the previous June 30 ("Initial Filing"). RMP proposes the timing of the filing to facilitate an annual update to the ECR effective on January 1 of each year. DPU, UCE, and Vote support RMP's proposed annual filing and effective dates. OCS supports a timeline that is convenient for RMP and DPU in light of their other ongoing regulatory obligations.

**B. Content:** RMP states it will include updated input data and associated workpapers used to calculate the ECR with each Annual Update. DPU recommends that the input data and associated workpapers include models related to calculating the ECR and its components, including EIM historical data, capacity contribution factors, current carrying charges, and line losses, and agrees that RMP should file the models with the Annual Update or make them available during the proceeding. DPU further recommends that among those models, RMP should include a functional version of the then currently approved avoided cost and capacity models and the data used for the annual calculations. UCE adds that the Annual Update filing should contain an updated ECR, current values for each of the ECR components, and workpapers or reports providing the underlying information and data used to calculate each ECR component. RMP agrees to provide the information requested by DPU and UCE.

In addition to workpapers and input data related to RMP's calculation of the ECR in each Annual Update, UCE and Vote request RMP also provide extensive historical data related to the ECR, including historical ECR rates and ten years of historical ECR inputs. This data would enable the calculation of a hypothetical ECR for each of those pre-ECR years. RMP recommends the Public Service Commission (PSC) reject UCE and Vote's request. RMP asserts that the information will be available on the PSC's website, the request is administratively burdensome, and requiring RMP to serve as the data source for information solar installers provide to customers may give those customers the false impression that a solar installer's claims have greater weight or come directly from RMP.

**C. Process:** RMP, OCS, and UCE advocate for a process that efficiently incorporates routine updates to inputs in the calculation methods we approved in our October and April Orders, and that avoids relitigating issues that have already been decided. To preserve the efficiency of the annual update procedure, RMP proposes that parties be allowed to "propose a more extensive process if material circumstances arise," but that such a process be separate and not "delay or forestall" the regular Annual Update procedure.<sup>2</sup>

RMP states that the Annual Update will be a tariff filing and may be subject to Utah Admin. Code R746-405-2.E., Approval of Filed Tariff Sheets ("Tariff Rule"), which provides that a tariff filing becomes effective after 30 days unless a party recommends the PSC suspend, alter, or modify the tariff within 15 days. RMP recommends that, whether or not subject to the

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<sup>2</sup> Rocky Mountain Power's Comments on Annual ECR Update (June 8, 2021), at 1.

Tariff Rule, its Annual Update be subject to an automatic comment period of a fixed number of days rather than to a PSC-established comment period.

DPU proposes a five-step process for the Annual Update similar to the PSC-approved process for reviewing RMP's Electric Service Schedule No. 38, Qualifying Facility (QF) Procedures. Under DPU's proposal: (1) RMP would designate updates in its filing as routine or non-routine; (2) a 15-day comment period would begin automatically after RMP's Initial Filing; (3) routine, unopposed updates become effective January 1 of the following year; (4) through a pre-determined process, parties could challenge any proposed update or tariff change; and (5) the PSC would address non-routine updates or tariff changes that do not align in timing with routine updates in a process separate from the Annual Update.

DPU proposes that uncontested, routine updates would be implemented in a recalculated ECR effective January 1, while non-routine updates would be separately litigated upon a party's petition, with the resulting updates implemented in a recalculated ECR effective the following January 1 or as directed by the PSC. OCS adds that the PSC should specifically identify the components of the ECR not suited to annual updates and provide clear direction to parties of the process that parties should use to obtain a more in-depth review of a particular ECR component.

OCS asserts that "it makes sense for routine updates to be reviewed and implemented relatively quickly, within 30 to 60 days."<sup>3</sup> And, like DPU, OCS envisions a process similar to that used for Schedule 38 updates, where RMP identifies any updates as routine or non-routine.

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<sup>3</sup> Comments from the Office of Consumer Services on Annual ECR Update (June 8, 2021), at 2.

OCS asserts that because the ECR update will be a tariff filing, it will go into effect 30 days after filing unless the PSC rules otherwise.

UCE agrees with many RMP, DPU, and OCS recommendations, including that: (1) non-routine or substantive changes to the ECR methodology should be addressed through a separate proceeding outside of the annual update process that could be initiated by PSC directive, an RMP Application, or a Request for Agency Action; (2) the PSC should provide guidance on how parties can propose updates outside of the annual process; and (3) changes to the tariff approved by the PSC outside of the Annual Update process should become effective at the next annual review, rather than through a mid-year revision to the ECR.

UCE and Vote request the PSC invite two rounds of comments for the Annual Update rather than a brief, automatic 15-day comment period. UCE recommends a three-week comment period to review an Annual Update along with two weeks to file reply comments. Vote adds that such a two-round comment period could be administered within the 60-day time period proposed by OCS.

Further, UCE requests the Annual Update include a process in which parties are permitted to petition the PSC to request consideration of new, quantified costs or benefits that should be incorporated into the ECR at the same time as RMP's Initial Filing.

In addition to its proposal for a regular Annual Update process, for this year's first Annual Update, DPU expresses interest in participating in a limited number of workgroup sessions with other parties during the remainder of this year. DPU hopes to collaborate with the other parties to ensure they agree on a smooth procedure for the Annual Update and that this

collaboration will help avoid lengthy future litigation. UCE supports DPU's recommendation and suggests RMP facilitate at least one workgroup meeting to further discuss issues related to the format and content of the ECR, including the proper way for RMP to calculate and report the profile of customer exports. Vote similarly requests that the parties convene for a "small number of workgroup sessions" to address initial uncertainties in RMP's filing, including its proposal to report the profile of customer exports as a daily average.<sup>4</sup>

**D. Scope:** RMP generally proposes to separate ECR inputs into three categories: those that it plans to update annually, those that it plans to update routinely but less frequently than annually, and those that it plans to update non-routinely through a more fully litigated process outside of the Annual Update.

Under RMP's proposal, annually updated inputs would generally be those calculated from annual system data or annually updated in a separate regulatory process. Initially, those inputs include the profile of customer export volume and installed customer nameplate capacity ("Customer Export Profile"), 15-minute energy imbalance market prices reported by the California Independent System Operator ("EIM Prices"), RMP's open access transmission tariff (OATT) rate, and hourly Utah load. RMP adds that the Customer Export Profile will reflect "weighted-average exports for a single typical customer," and EIM Prices will reflect prices from the PacifiCorp East EIM load aggregation point.<sup>5</sup> RMP will use the OATT rate it calculated and filed with FERC on June 1 before each annual update filing.<sup>6</sup>

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<sup>4</sup> Vote Solar's Reply Comments (June 29, 2021), at 3.

<sup>5</sup> Rocky Mountain Power's Comments on Annual ECR Update (June 8, 2021), at 2.

<sup>6</sup> RMP typically files an informational copy of its FERC Transmission Formula Rate Annual Update with the PSC in a miscellaneous docket. Most recently RMP filed this update on May 14, 2021 in Docket No. 21-999-01,

Infrequently updated inputs would be those that RMP regularly updates, but less frequently than annually, usually via a separate regulatory process. Initially, those inputs would include line loss rates and integration costs. RMP states its line loss values will be consistent with the line loss study used to develop the rates approved by the PSC in the most recent general rate case. And RMP proposes to update its ECR calculation using the integration costs reported in its most recently-filed Integrated Resource Plan (IRP).

Non-routinely updated inputs would be those that RMP sees as requiring holistic analysis, litigation, and adjustment, and that it will only update outside of the Annual Update proceeding. Initially, those inputs would include those associated with generation and distribution capacity costs, a change to the pricing node used in the historical energy valuation as recommended by DPU, and capital carrying charges. RMP states that generation and distribution capital costs, fixed operations and maintenance costs, and carrying charges should all be updated in a “future export credit proceeding,” as these costs are “interrelated[,] and a piecemeal approach to updates may not result in a balance consistent with that ordered by the [PSC].”<sup>7</sup>

With the exception of integration costs, capacity contribution values, and generation and distribution capacity costs, DPU, OCS, and UCE substantially agree on RMP’s proposed scope of the Annual Update.<sup>8</sup>

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*Miscellaneous Correspondence and Reports Regarding Electric Utility Services; 2021.*

<sup>7</sup> Rocky Mountain Power’s Reply Comments on Annual ECR Update (June 29, 2021), at 2.

<sup>8</sup> Compare DPU’s proposed Annual Update Scope, Comments from the Division of Public Utilities (June 8, 2021), at 4–6 to OCS’s proposed Annual Update Scope, Comments from the Office of Consumer Services (June 8, 2021), at 2–3, and UCE’s proposed Annual Update Scope, Utah Clean Energy’s Comments (June 8, 2021), at 5–7; see also Reply Comments from the Division of Public Utilities (June 29, 2021), at 1 (“The Division, Rocky Mountain Power (RMP), and the Office of Consumer Services (OCS) appear in general to agree on the timing, process, and scope of the annual review . . .”), Rocky Mountain Power’s Reply Comments on the Annual ECR Update (June 29, 2021), at 1 (“The Company, Division, Office[,] and UCE all agree on many aspects of the timing, procedure, and scope of

OCS recommends the PSC specifically approve integration costs in RMP's IRP filing before new integration costs are incorporated into the ECR. DPU recommends not updating the capacity contribution value annually until such time as deemed necessary based on market trends or the IRP, but no longer than every three years. RMP disagrees with these recommendations. UCE initially recommended that generation and distribution capital costs, both inputs to avoided capacity costs, be updated on a two-year cycle concurrent with the IRP. But after considering RMP's recommendation that those inputs be updated infrequently, UCE asserts that its recommendation is not that the inputs necessarily be updated every two years. Rather, UCE seeks to ensure that the inputs, when updated, are based on information that is publicly available to parties through a filing before the PSC to avoid unnecessary additional work and to facilitate simple and transparent review.

### **III. DISCUSSION, FINDINGS, AND CONCLUSIONS**

In our October Order we determined that ECR updates should “focus on the narrow issues related to the values represented in the ECR,”<sup>9</sup> and that some inputs would be recalculated annually while others would be reviewed annually and updated with additional process.<sup>10</sup> Consistent with this goal, the parties express agreement on many aspects of the Annual Update procedure.

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the annual filings . . .”).

<sup>9</sup> Order, Docket No. 17-035-61 (October 30, 2020), at 8.

<sup>10</sup> *See, e.g., id.* at 9 (discussing annual updates of avoided energy costs based on EIM price data) and 15 (stating that annual updates provide an opportunity to adjust capacity contribution values as new resources are added to the system).



**A. Filing, Process, and Effective Dates**

**i. Filing Deadlines and Comment Period:** We find to be reasonable the parties' proposal that RMP file the Annual Update on a certain date each year in a filing that incorporates 12-month data ending the previous June 30. But we recognize that RMP and commenting parties may benefit from additional time to analyze ECR inputs and consider issues that could impact each year's Annual Update. We are mindful of the staff time constraints at certain times of the year expressed by DPU. However, there are also generally multiple dockets that require PSC approval by January 1, which strains PSC personnel resources during the final two weeks of each calendar year. We decline to establish another year-end approval.

We conclude that a routine Annual Update might in some circumstances constitute an advice letter under Utah Admin. Code R746-405-2.E.2. Accordingly, we conclude that a 30-day review process for routine ECR updates is most consistent with that rule and establishes a process that will not change each year depending on the nature of the routine updates. To accommodate the staff time constraints articulated by the DPU, though, and to accommodate concerns expressed by other parties about the need for time to evaluate routine updates, we establish the Notice of Intent to use ECR Input described below.

Given that rationale, we approve a filing schedule for RMP's annual Schedule 137 and ECR update to accommodate approved routine updates taking effect beginning on March 1, a day reasonably consistent with the beginning of the new annualized billing period for Schedule 137 customers. RMP's Annual Update filing deadline will be 30 days before the target effective date. The deadline for comments will be 15 calendar days after RMP's Annual Update filing,

regardless of whether we issue a notice of filing and comment period.<sup>11</sup> Within that comment period any party may file a petition to suspend, alter, or modify the Annual Update. Routine updates that are not the subject of a petition to suspend, alter, or modify will become effective on March 1. Parties that seek to redesignate routine updates as non-routine, or to request additional process related to issues outside of the Annual Update procedure should also file a petition to do so within the 15-day comment period. Parties that seek to introduce a new quantified cost or benefit to the ECR or modify an ECR input or calculation method already approved in the October and April Orders may file a request for agency action to have those issues considered in a process separate from the Annual Update.<sup>12</sup>

**ii. Additional PSC Requirement - Notice of Intent to Use ECR Input:** We recognize that parties may require additional review any time RMP introduces a new data set, input, or calculation into its ECR determination, and that parties may benefit from additional time to review input data. We seek to ensure that parties have ample time to review any new input data or calculation before RMP files the Annual Update. Accordingly, RMP shall make a preliminary filing before each Annual Update when it intends to use an input, component, or calculation to determine the ECR that interested parties have not had the opportunity to review in a public forum. For any input, component, or calculation that RMP uses to determine the ECR that was not filed in a state or federal public process, or that RMP has not otherwise made publicly available prior to December 1,<sup>13</sup> RMP shall file a notice of intent with the PSC that it intends to

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<sup>11</sup> Our general practice is to issue a notice of filing and comment period for transparency even when one is not required.

<sup>12</sup> We will evaluate the appropriate effective date in those proceedings.

<sup>13</sup> In the Notice of Intent to Use ECR Input, RMP shall identify any input, component, or calculation that RMP

use such an input, component, or calculation to determine the ECR (“Notice of Intent”). RMP shall file any required Notice of Intent no later than December 1. If in an Annual Update, RMP uses any input, component, or calculation to determine the ECR that is not the subject of a Notice of Intent and has not been filed in a state or federal public process by December 1, that input, component, or calculation will be automatically deemed a non-routine update and will require separate approval outside of the Annual Update.

**B. Content**

RMP commits to including the workpapers used to calculate the ECR as well as the input files for the updated data as requested by DPU and UCE. We find that RMP’s proposal to include workpapers and input data with each Annual Update will provide sufficient information to evaluate RMP’s proposed changes to the ECR.

UCE and Vote request that we require RMP to include certain historical ECR values and input data with every Annual Update. UCE and Vote argue that this information will support solar installers’ disclosure obligations under Utah Code Title 13, Chapter 52, Residential Solar Energy Disclosure Act. According to UCE, while certain information related to this disclosure is available, no information about changes to the ECR value over time is currently available. UCE asserts solar installers and customers “have neither the depth of knowledge of the ECR calculation nor the historical data necessary to forecast its future value.”<sup>14</sup> UCE adds that this

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otherwise made publicly available.

<sup>14</sup> UCE Comments (June 8, 2021), at 10.

information would help “inform a potential solar customer’s own evaluation of [a potential] solar [panel installation].”<sup>15</sup>

We decline to require RMP to provide the information that UCE and Vote request. Were it the Utah Legislature’s intention for a utility in Utah to be required to make that estimate, it could have imposed such a statutory requirement. The data requested by UCE and Vote is not necessary or relevant to the ECR Annual Update. If Utah solar installers subject to the Residential Solar Energy Disclosure Act believe they cannot meet their obligations under that act without additional information provided by RMP, they may request agency action to address that issue.

### **C. Other Process**

**i. Workgroup Meeting:** No party opposed the DPU’s, UCE’s, or Vote’s request for workgroup meetings prior to the initial filing. Due to the importance of this initial filing and to ensure a smooth evaluation, we find this request reasonable. Therefore we direct RMP to host at least one workgroup session with interested parties before the beginning of February 2022.

### **ii. Scope**

With the exception of integration costs, capacity contribution values, and generation and distribution capacity costs that we discuss below, there is broad agreement among the parties on the scope of the Annual Update, including how frequently RMP proposes to update each component and associated inputs, and the source from which RMP indicated it will obtain those components and inputs. DPU, OCS, UCE, and Vote generally agree with RMP’s proposed

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<sup>15</sup> *Id.*

schedule for updating each of its ECR components and RMP's designation of a given component or input as routine or non-routine.

RMP has not yet filed workpapers or calculations for its first annual update, and we reserve the right to designate any update as non-routine if we determine that RMP has deviated from the ECR calculation methods that we approved in the October and April Orders. At this juncture, we approve RMP's proposed source and format for ECR components and inputs.

OCS argues that the PSC should separately approve integration costs reported by RMP in its IRP process before RMP is allowed to include those costs in its calculation of an ECR update. RMP disagrees and argues that waiting for PSC review of cost inputs such as integration costs would "result in a lag" that would cause those costs to be "frequently ... outdated."<sup>16</sup> We decline to impose a specific approval process for integration costs before they can be included in an ECR update. First, RMP's IRP process is evaluated pursuant to our June 18, 1992 Report and Order on Standards and Guidelines, provision 5 of which states "PacifiCorp will submit its IRP for public comment, review[,] and acknowledgment."<sup>17</sup> Under that Order, comments related to integration costs are typically addressed via guidance rather than litigation and approval in an IRP docket.

In addition, as RMP points out, it regularly includes costs from filed, not approved or acknowledged, IRPs in calculating avoided costs rates for QFs under Schedule 38 without waiting for PSC review, and that practice ensures that Schedule 38 pricing includes the most

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<sup>16</sup> Rocky Mountain Power's Reply Comments on Annual ECR Update (June 29, 2021), at 3.

<sup>17</sup> *In the Matter of Analysis of an Integrated Resource Plan for PacifiCorp* (Order issued June 18, 1992); Docket No. 90-2035-01.

updated costs possible. And OCS itself expresses concern with frequently updating RMP's costs embedded in the ECR, asking us to require "prompt updates in the annual filing immediately following other regulatory processes that update input costs."<sup>18</sup> As with other aspects of the Annual Update procedure that we approve, parties may petition for additional process or to modify a given component of the ECR calculation after reviewing the components, inputs, and workpapers filed by RMP in advance of each Annual Update.

Given the variance in the models, assumptions, and timing of the assumptions the parties believe to be correct in how the capacity contribution is calculated, DPU recommends not updating capacity contribution values until necessary based on market trends or the IRP, but at least every three years. RMP disagrees, asserting that the approved capacity contribution calculation methodology is simple, mechanical, and utilizes a simple annual update of the customer generation export profile during the top 10% of Utah load hours compared to the more complicated IRP production cost models. RMP maintains that should a party wish to provide evidence to the PSC suggesting a change in the methodology, it would be appropriate to allow for additional process and opportunity for review beyond that proposed for the annual filing.

UCE also disagrees with DPU's proposal. UCE states Schedule 136 is closed to new customers, so the characteristics of the solar installations in this rate schedule (including location, tilt, and capacity) will remain static from year to year.

We find RMP's proposed annual update to the capacity contribution value reasonable. Our April Order was premised, in part, on creating a straightforward process for updating

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<sup>18</sup> Comments from the Office of Consumer Services (June 8, 2021), at 3.

capacity contribution values. We therefore approve RMP's proposal to update the capacity contribution value annually based on the method we approved in our April Order.

RMP proposes no updates of capital cost inputs to generation or distribution capacity costs in the Annual Filing. According to RMP, the relevant input assumptions are drawn from disparate sources, and a piecemeal approach to updates may not result in a balance consistent with that ordered by the PSC. In addition, RMP asserts it is not a simple process to identify generation capacity costs from the IRP. As a result, a comprehensive review that is beyond the reasonable scope of the Annual Update would be necessary to update generation and distribution capacity costs. We find that updates to generation and distribution capacity will require analysis and evaluation that is not reasonable within the Annual Update process. RMP or any other party may request those updates outside of the routine update schedule.

### **III. ORDER**

Pursuant to the foregoing discussion, findings, and conclusions:

1. We approve the content and scope of RMP's annual Schedule 137 update filing described in RMP's June 8, 2021 comments and June 29, 2021 reply comments;
2. We approve a routine Annual Update schedule with a target effective date on March 1, a filing deadline for RMP's Schedule 137 update of 30 days before the target effective date, and a comment deadline of 15 calendar days after the filing;
3. The Annual Update shall incorporate 12 months of data ending the previous June 30;

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4. RMP shall classify annual updates as routine or non-routine. A party may file a request for agency action for consideration of any non-routine update separate from the Annual Update;
5. RMP shall file a notice of intent to use any calculation, input, or workpaper not publicly available in a federal or state forum no later than December 1 before any Annual Update where RMP uses the calculation, input, or workpaper to determine the ECR; and
6. RMP shall conduct at least one workgroup meeting before the beginning of February 2022 with representatives of the parties that submitted comments regarding the Annual Update procedure in this docket.

DATED at Salt Lake City, Utah, August 11, 2021.

/s/ Thad LeVar, Chair

/s/ David R. Clark, Commissioner

/s/ Ron Allen, Commissioner

Attest:

/s/ Gary L. Widerburg  
PSC Secretary  
DW#319940



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Notice of Opportunity for Agency Review or Rehearing

Pursuant to §§ 63G-4-301 and 54-7-15 of the Utah Code, an aggrieved party may request agency review or rehearing of this written Order by filing a written request with the PSC within 30 days after the issuance of this Order. Responses to a request for agency review or rehearing must be filed within 15 days of the filing of the request for review or rehearing. If the PSC does not grant a request for review or rehearing within 30 days after the filing of the request, it is deemed denied. Judicial review of the PSC's final agency action may be obtained by filing a petition for review with the Utah Supreme Court within 30 days after final agency action. Any petition for review must comply with the requirements of §§ 63G-4-401 and 63G-4-403 of the Utah Code and Utah Rules of Appellate Procedure.

CERTIFICATE OF SERVICE

I CERTIFY that on August 11, 2021 a true and correct copy of the foregoing was served upon the following as indicated below:

By Email:

Data Request Response Center ([datareq@pacificorp.com](mailto:datareq@pacificorp.com), [utahdockets@pacificorp.com](mailto:utahdockets@pacificorp.com))  
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