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April 19, 2017

VIA ELECTRONIC FILING

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

Attention: Gary Widerburg
Commission Secretary

Re: **Reply Comments**
In the Matter of Rocky Mountain Power's Proposed Revisions to Electric Service
Schedule No. 73, Subscriber Solar Program
Docket No. 17-035-T06

On March 28, 2017, the Public Service Commission of Utah (“Commission”) issued a Notice of Filing and Comment period in the above referenced matter, allowing parties to file comments by March 12, 2017, and reply comments by April 19, 2017. The Division of Public Utilities (“DPU”) and the Office of Consumer Services (“OCS”) filed comments April 6, 2017 and April 12, 2017, respectively. Rocky Mountain Power (the “Company”) provides these reply comments in response to comments filed by OCS.

The DPU concluded the Company’s proposed changes to Schedule 73 were reasonable, and therefore recommended the Commission approve the proposed changes. OCS, however, opposed the changes as proposed and recommended the Company provide a new proposal incorporating OCS’ suggestions stated in their comments and further described below.

OCS contends that Special Condition 7 in Schedule 73 should maintain the “will pay” language, but add a note that describes the circumstances when the \$50 cancellation fee may be reduced. The purpose of changing the language to “may pay” is so the Company can reduce the number of cancellation fees if warranted, as described in Advice No. 17-06. The Company cannot foresee every circumstance in which it would be appropriate for the cancellation fee to be reduced or waived, and is therefore unable to describe in Schedule 73 a comprehensive list of circumstances as OCS suggests. It is a common industry standard for fees to be waived or reduced for customers, when warranted. The Company believes this is in the best interest of customers, and will minimize the charging of unnecessary fees while not adversely affecting the Subscriber Solar Program (“Program”).

OCS further contends that the “will not accept” language should remain in Special Condition 8, suggesting the opportunity to subscribe will be open to customers once they reach the 12-month requirement. The Company disagrees with the notion that the opportunity to subscribe *will* be open (emphasis added). If the Program becomes fully subscribed while customers await the 12-month

April 19, 2017

Page 2

requirement due to circumstances described in the Company's Advice No. 17-06, they will be placed on a waiting list when they otherwise could have subscribed. The Company believes it would be unjust to penalize customers in this way. As stated above, the Company cannot foresee every circumstance in which it would be appropriate to accept enrollments from customers that do not fully meet the 12-month requirement, and therefore could not comprehensively describe these circumstances in Schedule 73. The Company believes this is also in the best interest of customers, helping to create a fair, unbiased enrollment process that still protects the integrity of the Program.

For the reasons stated above, and with the support of the DPU, the Company respectfully requests the Commission approve the modifications to Schedule 73 as proposed in Advice No. 17-06, effective May 1, 2017.

Sincerely,

A handwritten signature in blue ink that reads "Michael S. Snow". The signature is written in a cursive style with a long, sweeping underline.

Michael S. Snow
Manager, DSM Regulatory Affairs

CERTIFICATE OF SERVICE

Docket No. 17-035-T06

I hereby certify that on this 19th day of April, 2017, a true and correct copy of the foregoing was served by electronic mail to the following:

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