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### **ACTION REQUEST RESPONSE**

To: Utah Public Service Commission

From: Utah Division of Public Utilities  
Chris Parker, Director  
Energy Section  
Artie Powell, Manager  
Myunghee Tuttle, Utility Analyst

Date: June 14, 2017

Re. 17-035-T08 – In the Matter of Rocky Mountain Power’s Proposed Revisions to Electric Service Schedule No. 135, Net Metering Service.

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### **RECOMMENDATION (Approval)**

The Division of Public Utilities (“Division”) recommends the Public Service Commission (“Commission”) approve the Rocky Mountain Power’s (“Company”) proposed revisions to Schedule 135, effective July 1, 2017. The Division determined that the Company’s filing complies with the Commission Order in Docket No. 08-035-78, dated February 12, 2009.

### **ISSUE**

On June 1, 2017, the Company filed its proposed revisions to Electric Service Schedule No. 135, Net Metering Service, with the Commission. The Company requested an effective date of July 1, 2017.

On June 1, 2017, the Commission issued an Action Request to the Division requesting the Division to investigate the Company’s filing and make recommendations. The Commission

asked the Division to report back by June 16, 2017. On June 5, 2017, the Commission issued a Notice of Filing and Comment Period in which it stated that “Any interested party may submit comments on or before **Tuesday, June 20, 2017** and may submit reply comments on or before **Tuesday, June 27, 2017.**” The Division recognizes that the Notice of filing and Comment Period supersede the Action Request. This memorandum represents the Division’s response to the Commission’s request to investigate the Company’s filing.

## **DISCUSSION**

In its Order in Docket No. 08-035-78, dated February 12, 2009, the Commission directed the Company to annually update the valuation of net excess generation credits for large non-residential customers in Schedule 135 to reflect the average retail rates for the previous year’s FERC Form No. 1.

In compliance with the Commission’s Order, the Company filed its Third Revision Sheet No. 135.4 of Electric Service Schedule 135. This sheet contains the updated net excess generation credits for large non-residential customers in Schedule 135. In this filing, the Company also provided Exhibit 1, which shows how the average retail credits are calculated for large non-residential customers. The Division has reviewed whether the information used to calculate the average credits is consistent with the previous year’s FERC Form No. 1 stated numbers and whether the value for average retail credits for the large non-residential customers is calculated properly. The Division determined that the calculations are performed correctly using the appropriate information. The \$.0025 overall difference between Exhibit 1 and FERC Form 1 Utah Supplemental is reasonable.

In reviewing the Company’s advice letter for this matter, Utah Administrative Code Rule 746-405-2 (D) (3) (g) requires a statement that the tariff sheets proposed do not constitute a violation of state law or Commission rule. However, the rule also states that the filing of proposed tariff sheets shall of itself constitute the representation of the filing utility that it, in good faith, believes the proposed sheets or revised sheets to be consistent with applicable statutes, rules and orders. The filing does not appear to violate statute or rule.

Therefore, the Division concludes that the Company's filing complies with the Commission Order. Hence, the Division recommends that the Commission approve the Company's filing effective July 1, 2017.

CC: Bob Lively, RMP  
Michele Beck, OCS