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Division of Public Utilities

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Reply Comments

To: Public Service Commission

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

Date: May 7, 2018

Re: Reply Comments, Docket No. 18-035-11 - Rocky Mountain Power's Annual Report of the Subscriber Solar Program for the Period of January 1, 2017 through December 31, 2017.

Original Comments and Recommendations Corrections

The Division of Public Utilities (Division) has become aware of minor corrections needed for clarity to its original comments filed on April 26, 2018. These corrections do not change the Division's recommendation that the Commission acknowledge RMP's 2017 annual report.

Issue

On March 30, 2018, RMP filed its Subscriber Solar annual report with the Commission. On the same day, the Commission issued an action request to the Division to review RMP's filing for compliance and to make recommendations with a due date of April 30, 2018. On April 3, 2018, the Commission issued its Notice of Filing and Comment Period allowing any interested party to submit comments on or before April 30, 2018 and reply comments on or before May 15, 2018. On April 26, 2018, the Division filed its action request response comments recommending

acknowledgement. The following are the Division's corrections to its original comments and recommendations.

Discussion

On page 3 of the Division's comments, it states that:

"The total subscription comprises 217,089 customers in total, with 74,944 residential, and 142,145 commercial."

The Division erred in stating 217,089 customers when it should have stated 217,089 **blocks** in total, comprised of 74,944 residential **blocks** and 142,145 commercial **blocks**. Further clarification from RMP indicates the 217,089 **blocks** are comprised of 2,623 residential customer meters and 666 commercial customer meters.

On page 5, the Division recommends that:

"RMP update its Program Costs Model (08Mar2018.xlsm) to reflect the new tax rate as a result of the latest federal tax reform. This change does not have a material impact on the spreadsheet results."

RMP's Program Costs Model (08Mar2018.xlsm) referenced is a confidential spreadsheet originally used to demonstrate the program's feasibility, which is now used as a tracking sheet to compare forecast revenues and expenses to actual revenues and expenses as part of the Division's annual review of the Subscriber Solar Program. This is not submitted with the annual filing but obtained through request. The Division has been notified that the 2018 version of this spreadsheet has been revised to reflect the recent tax rate change. The tax rate change would have no impact on the 2017 Subscriber Solar Status report.

Conclusion

The Division submits the corrections reported herein and continues to recommend the Commission acknowledge RMP's 2017 annual Subscriber Solar Status Report.

CC Jana Saba, RMP
Michael Snow, RMP
Michele Beck, OCS
Service List