

July 17, 2018

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 Secretary

RE: Docket No. 18-035-24
Solar Photovoltaic Incentive Program (Schedule 107) 2018 Annual Report
Reply Comments

On June 5, 2018, the Public Service Commission of Utah (“Commission”) issued a Notice of Filing and Comment Period (“Notice”) requesting comments on Rocky Mountain Power’s (“Company”) June 1, 2018 annual report of the updated results from the Solar Photovoltaic Incentive Program offered through Electric Service Schedule No. 107 (“Report”). On July 2, 2018, the Division of Public Utilities (“Division”), the Office of Consumer Services (“Office”) and Utah Clean Energy (“UCE”) each filed comments. Consistent with the Notice, the Company submits reply comments below.

Response to the Division’s Comments

The Division recommends that the Commission acknowledge the Company’s Report, concluding that it meets the Commission’s reporting requirements. The Division further recommends that the Company include an explanation and correlation of Utah Solar Incentive Program (“USIP”) amounts to those reported in the Company’s annual STEP reports, specifically the amounts reported in the STEP Status Report Filing in Docket No 18-035-16 in Exhibit 1.0. The Company agrees with the Division’s request and will provide the information in the annual USIP reports that correlates to the USIP information included in the STEP reports.

Response to the Office’s Comments

The Office also recommends that the Commission acknowledge the Company’s Report, concluding that it meets the Commission’s reporting requirements. The Office made two recommendations. First, the Office recommends that the Company add clarifying language in the tables showing Surrendered Deposits. Second, the Office requests that the Company identify and provide an explanation when a report contains a correction, change or update from the previous year. The Company agrees with the Office’s recommendations.

Response to UCE’s Comments

UCE makes several recommendations in their comments regarding continued reporting of USIP and use of any program funds remaining. First, UCE recommends that the Company

continue to report on USIP expenses until all outstanding obligations have been paid to incentive award recipients. Second, UCE requests the Company project anticipated installment payments for large non-residential customers, for which incentives are paid in annual installments for four years following the completion of their project, to predict whether the program is likely to result in a net positive account balance. The Company agrees to continue reporting USIP expenses and to provide a projection of the remaining program balance until the final incentive payments are paid to customers. The current USIP report was designed to provide information related to an active, ongoing program. Now that the program has ceased accepting new applications, the Company recommends that it be required to provide only following information going forward:

1. Program totals for interconnected projects
2. Production meter data for large non-residential projects (Attachment B)
3. Program account summary (Table 15)
4. Projected expenditures by year
5. Renewable energy certificates (Table 16)

Third, UCE requests that any remaining funds be used to promote the installation of solar equipment, and that the Company be required to facilitate a process by which interested parties could provide feedback on possible uses for any remaining funds. The Company believes that it is premature to determine the best use of these funds and does not agree with UCE that a stakeholder process on this topic is necessary at this time. Once the final amount of remaining funds is more certain, the proper use of those funds should then be determined.

Sincerely,



Joelle Steward

Vice President, Regulation

CC: Service List - Docket No. 18-035-24

CERTIFICATE OF SERVICE

Docket No. 18-035-24

I hereby certify that on July 17, 2018, a true and correct copy of the foregoing was served by electronic mail to the following:

Utah Office of Consumer Services

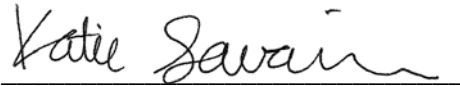
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