



## Public Service Commission

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July 25, 2018

Ms. Jana Saba  
Rocky Mountain Power  
1407 West North Temple, Suite 330  
Salt Lake City, UT 84116

Data Request Response Center  
PacifiCorp  
825 Multnomah St., Suite 2000  
Portland, OR 97232

Re: *Rocky Mountain Power's Solar Photovoltaic Incentive Program (Schedule 107) 2018 Annual Report*; Docket No. 18-035-24

Dear Ms. Saba:

The Public Service Commission ("PSC") reviewed the June 1, 2018 filing by PacifiCorp, dba Rocky Mountain Power ("PacifiCorp"), of its Utah Solar Incentive Program (Program) 2018 Annual Report (Report) presenting results through May 16, 2018. The PSC also reviewed the comments filed by the Division of Public Utilities ("DPU"), the Utah Office of Consumer Services (OCS), and Utah Clean Energy ("UCE") on July 2, 2018, and the reply comments filed by PacifiCorp and the OCS on July 17, 2018.

The DPU and the OCS both recommend the PSC acknowledge the Report. The DPU provided a summary of the Program, including reporting requirements and relevant PSC decisions,<sup>1</sup> and a detailed analysis of the content of the Report. The DPU concludes the Report contains the information required by the PSC orders and letters and that the information in the Report is consistent with that presented in PacifiCorp's first annual Sustainable Transportation and Energy Plan ("STEP") Status Report.<sup>2</sup> The DPU recommends the PSC direct PacifiCorp to include an explanation and correlation of Program amounts to those reported in Exhibit 1.0 in PacifiCorp's STEP Status Report filing. The OCS concurs with this recommendation. In its reply comments PacifiCorp agreed with the DPU's recommendation.

The OCS commented on issues including reporting on surrendered deposits and generation data for large systems. The OCS recommends the heading related to surrendered deposits should be modified

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<sup>1</sup> See *In the Matter of the Investigation into Extending and Expanding the Solar Incentive Program and Possible Development of an Ongoing Program* (Order issued October 1, 2012); Docket No. 11-035-104. See also *In the Matter of Rocky Mountain Power's Annual Report of the Results from the 2013 Program Year for the Solar Photovoltaic Incentive Program Offered through Schedule 107* (Order issued September 25, 2014); Docket No. 14-035-71.

<sup>2</sup> See *Rocky Mountain Power's First Annual Sustainable Transportation and Energy Plan Act ("STEP") Program Status Report* (PacifiCorp's April 30, 2018 filing); Docket No. 18-035-16.

in future reports and that corrections, changes, and updates from previous years should be clearly identified and explained. In its reply comments PacifiCorp agreed with the OCS's recommendations.

UCE submitted comments and recommendations pertaining to continued reporting on the Program account balance until all outstanding obligations have been dispensed and forecasting of the Program's large non-residential incentive payment obligations in future annual reports. In its reply comments PacifiCorp agreed to continue reporting Program expenses and to provide a projection of the remaining Program balance until the final incentive payments are paid to customers.

UCE recommends that in the event the final Program balance is negative, any remaining funds should be used to promote the installation of solar photovoltaic generating equipment. UCE requests PacifiCorp undertake a stakeholder process to solicit feedback on possible uses for any remaining account balance. In its reply comments, PacifiCorp maintains it is premature to determine the best use of any remaining Program funds and therefore a stakeholder process on this topic is not necessary at this time. PacifiCorp states that once the final amount of remaining funds is more certain, the proper use of those funds should then be determined. The OCS objects to UCE's recommendation regarding the future disposition of possible remaining Program funds. The OCS maintains the STEP legislation precludes any use of the funds other than as an offset to future STEP costs and therefore the PSC should order any Program funds that are unspent at the end of the incentive payment cycle be returned to customers through a credit to STEP, Schedule No. 196, STEP Cost Adjustment Pilot Program.

In its reply comments, PacifiCorp proposes modifying the Program reporting requirements. Now that the Program has ceased accepting applications PacifiCorp recommends that it should only be required to provide the 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; and 5) Renewable energy certificates (Table 16).

Based on the PSC's review of the Report and the comments filed, the PSC acknowledges the Report as complying with the relevant reporting requirements. The PSC adopts those recommendations proposed by the DPU, the OCS, and UCE and that were agreed to by PacifiCorp in its reply comments.

With respect to recommendations and concerns raised regarding the use of remaining Program funds, these issues will be considered in an appropriate future proceeding once the amount of remaining Program funds, if any, is more certain.

PacifiCorp's proposal to modify its reporting requirements, presented in its reply comments, will be addressed separately. Concurrently with this letter the PSC is issuing a notice of comments and replies on that proposal.

Sincerely,

/s/ Gary L. Widerburg  
PSC Secretary  
DW#303605