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State of Utah
DEPARTMENT OF COMMERCE
Office of Consumer Services

MICHELE BECK
Director

To: Utah Public Service Commission

From: Office of Consumer Services
Michele Beck, Director
Cheryl Murray, Utility Analyst

Date: August 21, 2018

Re: In the Matter of the Investigation into Extending and Expanding the Solar Incentive Program and Possible Development of an Ongoing Program. Docket No. 11-035-104

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. Docket No. 14-035-71

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

Background

On July 17, 2018, Rocky Mountain Power (Company) filed reply comments (Reply Comments) in Docket No. 18-035-24 responding to July 2, 2018 comments of the Division of Public Utilities (Division), Office of Consumer Services (Office) and Utah Clean Energy (UCE) regarding the Company's Solar Photovoltaic Incentive Program (Schedule 107) 2018 Annual Report (Report).

On July 25, 2018, the Public Service Commission (Commission) issued a Notice of Filing and Comment Period noting that the Company filed reply comments in Docket No. 18-035-24 proposing modifications to its reporting requirements regarding the Utah Solar Incentive Program (USIP). The notice designates that any interested parties may submit comments on the Company's Reply Comments on or before Friday, August 24, 2018, and reply comments no later than Monday, September 10, 2018.

Pursuant to the Commission's established schedule the Office offers the following comments on the Company's request to modify its USIP reporting requirements.

Discussion

In Reply Comments the Company agreed to reporting recommendations made by the Division, the Office and UCE in their respective July 2, 2018 comments on the Report.

The Company did not support UCE's request that any remaining funds be used to promote the installation of solar equipment and disagreed that a stakeholder process on this topic is necessary at this time.

Additionally, the Company recommended that it be required to provide only the following information in annual reports 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)

Commission Response

On July 25, 2018 the Commission issued a letter to the Company acknowledging the Report as complying with the relevant reporting requirements. The Commission adopted the recommendations proposed by the Division, the Office, and UCE that were agreed to by the Company in its Reply Comments.

Regarding the use of remaining Program funds as proposed by UCE, the Commission indicated that those issues would be considered in a future proceeding once the amount of remaining Program funds, if any, is more certain.

The Commission further stated that the Company's proposal to modify its reporting requirements will be addressed separately, which led to the aforementioned July 25, 2018 Notice of Filing and Comment Period.

Office Response to Company Request to Modify USIP Reporting Requirements

The Office believes that there is still valuable information to be gained from USIP reports and a continuation of the reporting process remains necessary. However, we acknowledge that with the closing of the USIP program re-evaluating the reporting requirements is appropriate.

Among other reporting requirements, the Company recommends that future reports include “program totals for interconnected projects”. (Item number one on the Company’s list of information to be provided.) Without additional explanation the Office was unclear as to specifically what information would be provided and how it would be presented in future reports. Based on discussions with the Company it is our understanding that the Company will continue to provide Attachment A, System Specific Information, as part of future reports. Attachment A contains important specific details regarding each resource connected to the Company’s system and the Office recommends it continue to be part of the annual report. The Office expects the Company’s comments will provide more clarity on the issue.

Regarding the other requested changes the Office anticipates that if the information is presented fully and clearly it should be adequate to meet parties’ needs. However, as with most reports it may be necessary to request further modifications once we have reviewed the information and presentation format of the Company’s future reports

Surrendered Deposits

If the Company’s request to revise reporting requirements is approved, the tables identifying Surrendered Deposits will be eliminated from future reports.

Currently the Company provides a summary table of surrendered deposits for each program year. Surrendered deposits are used to offset the administration costs of the Program. Once the annual transfer of the value of the surrendered deposits for a given year has occurred those numbers do not change. The Company proposes to eliminate the tables which provide the annual numbers for surrendered deposits. The Office notes that the 2018 annual Report contains two tables related to surrendered deposits for the 2016 program year; Table 13. 2016 Surrendered Deposits – Completed, and Table 14. 2016 Surrendered Deposits – To Be Completed (awaiting final disposition of remaining active projects to complete final funds transfer). Because the 2018 Report did not contain a single table with the total breakout of 2016 surrendered deposits and the transfer of funds had not yet occurred, the Office recommends that the 2019 report should include a final table of 2016 results. Thereafter, the Office does not object to the elimination of surrendered deposit tables from future reports as they will not change year to year and there will be no further surrendered deposits.

Concluding Comments

Generally, the Office believes that the information the Company proposes to include in future reports, if presented fully and clearly, will be adequate for parties to evaluate the various aspects of the program. However, as noted above the Office anticipates the Company will provide clarification to its request when it files comments in this docket. Further, following review of the first report using the new requirements the Office may request additional modifications as appropriate.

Recommendations

The Office recommends that the Commission require the Company to include the surrendered deposit table for program year 2016 in its next annual filing. The Office supports the Company continuing to file Attachment A, which appears to be included in the Company's proposal. The Office withholds its final recommendation on the Company's requested modifications until it reviews the Company's initial comments to confirm its understanding of the Company's proposal.

CC: Chris Parker, Division of Public Utilities
Joelle Steward, Rocky Mountain Power