



State of Utah
Department of Commerce
Division of Public Utilities

FRANCINE GIANI
Executive Director

CHRIS PARKER
Director, Division of Public Utilities

GARY HERBERT
Governor

SPENCER J. COX
Lieutenant Governor

RESPONSE COMMENTS

To: Utah Public Service Commission

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

Date: August 22, 2018

Re: **Acknowledge with Recommendation, Docket No. 18-035-24**, – Rocky Mountain Power’s Solar Photovoltaic Incentive Program (Schedule No. 107) 2018 Annual Report.

RESPONSE COMMENTS AND RECOMMENDATION (Acknowledge with Recommendation)

The Division of Public Utilities (“Division”) has reviewed Rocky Mountain Power’s (“RMP”) proposal to modify the reporting requirements for the Utah Solar Photovoltaic Incentive Program Annual Report (“Report”). The Division does not object to RMP’s proposal with the additional changes described herein.

ISSUE

On June 1, 2018, RMP filed with the Commission its Utah Solar Photovoltaic Incentive Program (“USIP”) Annual Report for the 2017 program year. On the same day, the Utah Public Service Commission (Commission) issued an Action Request to the Division to review the Report for compliance and make recommendations by July 2, 2018. On the Same day, the Commission gave Notice of Filing and Comment Period to interested parties for comments and reply comments due on or before July 2, 2018, and July 17, 2018, respectively. On July 17, 2018, RMP filed reply comments addressing the Division’s and other parties’ recommendations. On July 25, 2018, the Commission acknowledged RMP’s report as complying with the relevant

reporting requirements and adopted the recommendations of the Division, Office of Consumer Services, and Utah Clean Energy as agreed to by RMP. In its memo to RMP, the Commission stated that it would treat the reporting recommendations by RMP separately.¹ The Commission gave Notice of Filing and Comment Period to address the filing recommendation on July 25, 2018 asking interested parties to file comments on or before August 24, 2018 and reply comments on or before September 10, 2018. This memorandum is the Division's response to that request.

DISCUSSION

The Commission's approval of The Sustainable Transportation and Energy Plan Act (STEP) on December 29, 2016, ended new participant entry into the USIP program and thus, the need for several reporting requirements. The USIP program expenses and balances now fall under the STEP program annual reporting. RMP agrees to provide documents that will correlate the USIP and STEP programs within their respective reports.² Therefore, the Division supports RMP's recommendations to change the reporting requirements for the USIP reporting requirements as proposed by RMP:

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

Additionally, the Division recommends that the Commission order RMP to continue to provide Attachment A including updated Renewable Energy Certificate information, and one more year of "Surrendered Deposit" data so interested parties can reasonably conclude that no more projects are pending, and only incentive payouts remain.

¹ Commission Memo to Rocky Mountain Power, Gary L. Widerburg, Rocky Mountain Power's Solar Photovoltaic Incentive Program (Schedule 107) 2018 Annual Report; Docket No. 18-035-24, July 25, 2018.

² Commission Order, Rocky Mountain Power's First Annual Sustainable Transportation and Energy Plan Act ("STEP") Program Status Report, August 3, 2018, page 7, ¶ 3.

CONCLUSION

With the recommendations stated herein, the Division supports RMP's recommendation to modify the reporting requirements for the remainder of the Utah Solar Incentive Program.

cc: Joelle Steward, RMP
Jana Saba, RMP
Michele Beck, OCS
Service List