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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

Rocky Mountain Power Customer Owned Generation and Net Metering Report	Docket No. 18-035-28
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**Reply Comments by the Utah Solar Energy Association Regarding
Docket No. 18-035-28**

BACKGROUND

The Utah Solar Energy Association (USEA) submits these reply comments in response to initial comments filed by other parties on or before August 1, 2018 in Docket No. 18-035-28, Rocky Mountain Power’s Customer Owned Generation and Net Metering Report. USEA’s reply comments focus on two themes brought forward in initial comments by the Office of Consumer Services (Office) and Utah Clean Energy (UCE).

1. UTAH WEATHERIZATION ASSISTANCE PROGRAM

Both the Office and Utah Clean Energy recommend moving expired excess credits from the low-income rate program to the low-income weatherization program. We believe, as do both the Office and UCE, that the expired credits will have more

incremental effect in the weatherization program, especially as the program has a waitlist. Perhaps more compelling for USEA is that the weatherization program works to reduce energy consumption in low-income households, which is in line with the motivations of rooftop solar customers. Furthermore, assistance given one time for energy efficient improvements helps households for years to come.

Not only is the mission of the weatherization program in line with rooftop solar customer motivations, but in speaking with dozens of net metering customers about their expired credits, they would feel better about the direct assistance to low-income customers rather than having their credits be a very small percentage of the low-income rate program which essentially offsets expenses for the latter program. As can be imagined, rooftop solar customers do not all appreciate or fully understand that they lose excess credits each year but, generally, they feel better when told it is helping customers who need assistance. In our opinion, they would not feel better about essentially offsetting the expenses of existing Rocky Mountain Power (Company) programs.

2. DEVELOPMENT OF A LOW-INCOME SOLAR PROGRAM

Again, responding directly to comments filed by the Office and UCE, USEA believes that an additional low-income solar program should be considered, as was agreed upon in paragraph 39 of the settlement stipulation filed August 28, 2017 in Docket No. 14-035-114 (Net Metering Settlement). The Office on page 6 of comments filed on August 1, 2018 in this docket, asks reasonable questions regarding the number of customers served, administration of the program and the incremental value of such a program as opposed to the suggestion to use expired credits for the weatherization program.

UCE, however, went much further and developed a specific proposal for a low-income solar program. USEA offers the following comments to various aspects of the UCE proposal:

- USEA agrees that having the administration of a potential program run by the Utah WAP would be a good fit given their experience serving the target population and ability to identify appropriate service providers. This would keep administrative costs and burdens at a minimum.
- USEA agrees that participants in any solar program should, if allowed, also receive weatherization services in order to maximize the addition of a solar installation.
- USEA agrees that any solar array installed should not completely offset the expected household electricity costs but be sized to ensure savings and, therefore, also respect the finite resources of the expired credits.
- USEA believes that prioritizing homes that are well suited for solar is an important criteria, again, as it would help to maximize the impact of the finite resources of the expired credits.
- USEA will work with UCE to reach our members in the solar industry and help solicit donations of equipment, time, and additional funding to help maximize the effectiveness of a low-income solar program.
- USEA would also help to work with capital partners or third-party owners to leverage available state and federal tax credits available for solar installations.

SUMMARY

In summary, USEA agrees with the Office and UCE that any excess, expired credits of solar customers should be allocated to the Utah Weatherization Assistance Program rather than its current allocation to the low-income lifeline program. Furthermore, USEA will work with interested parties, including Utah WAP, to develop a low-income solar program for approval by the Utah Public Service Commission. USEA wants any such program to be something that has tangible benefits to the low-income population and to the State of Utah, overall.

/s/ Ryan Evans

Ryan Evans

President

Utah Solar Energy Association

CERTIFICATE OF SERVICE

Docket No. 18-035-2018

I hereby certify that a true and correct copy of the foregoing was served by email this 16th day of August, 2018, on the following:

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