



1407 West North Temple, Suite 330  
Salt Lake City, Utah 84116

May 14, 2019

***VIA ELECTRONIC FILING***

Public Service Commission of Utah  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84114

Attention: Gary Widerburg  
Commission Secretary

**RE: Docket No. 19-035-15**  
In the Matter of Rocky Mountain Power's 2018 Annual Report of the Subscriber Solar Program  
*Reply Comments*

On April 1, 2019, the Public Service Commission of Utah ("Commission") issued a Notice of Filing and Comment Period in the above referenced matter, with comments and reply comments to be submitted by April 29, 2019, and May 14, 2019, respectively. The Office of Consumer Services ("OCS") filed comments April 23, 2019, and the Division of Public Utilities ("DPU") and Utah Clean Energy ("UCE") filed comments April 29, 2019. Rocky Mountain Power ("Company") provides these reply comments in response to party comments.

The DPU recommends the Commission acknowledge the Company's 2018 Subscriber Solar Report ("2018 Report"), but to also require the Company to make the following corrections:

- Update the Solar Credit Donated spreadsheet with corrected references for non-levelized facilities for winter and summer rates; and
- Update the cost model to reflect current tax laws as a result of the latest federal tax reform.

The OCS recommends the Company provide an updated spreadsheet with the same corrections the DPU recommended to the Solar Credit Donated spreadsheet. The OCS further recommended that future reports contain a single table with all relevant information for the specific year of the report.

UCE appreciates the information contained in the 2018 Report and supports expanding the Subscriber Solar Program if the Company seeks approval of an expansion, but recommends the Company consider ways to better serve low-income customers for future expansions.

Attached hereto as Exhibit A is an updated 2018 Report that addresses the DPU's and OCS' recommendations concerning the Solar Credit Donated spreadsheet. Attached hereto as Confidential Exhibit B is an updated cost model that reflects current tax laws as recommended by the DPU. The Company will make best efforts to include "all relevant information" for the specific year of the report in a single table for future reports, as recommended by the OCS, but will continue to work with stakeholders to provide any missing or non-apparent information that is desirable.

Public Service Commission of Utah

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Regarding UCE's recommendation, while low-income customers are currently able to participate in the Subscriber Solar Program through Schedule 3, the Company will continue to discuss options for continual improvement.

Sincerely,

A handwritten signature in blue ink that reads "Michael S. Snow". The signature is written in a cursive, flowing style.

Michael S. Snow

Manager, Customer Solutions Regulatory Affairs

## Exhibit A

# Updated 2018 Annual Report of the Subscriber Solar Program

## 2018 Subscriber Solar Summary Report

## 2018 Program Marketing and Communications Highlights

### Program Management Commentary

The program is developing plans for a second solar plant. Customer survey results indicate customers are overall satisfied with program. Marketing and administration costs are lower than projected and a new offering of 100% solar is being proposed to enable customers to subscribe all of their usage to the program.

### Program Sales Summary

	2017	2018	2018 KWH	2018 % Sold
Total Residential Block Revenues	\$978,013.85	\$1,079,465.85	16,543,538	32.8%
Total Non-Residential Block Revenues	\$1,769,700.15	\$1,939,784.20	31,161,192	61.7%
Total Program Revenues	\$2,747,714	\$3,019,250	47,704,730	94.4%

### Program Expenses Summary

	2015	2016	2017	2018	Total Expenses
Total Program Management/Admin Expenses	\$14,403.35	\$1,015,874.86	\$88,844.28	\$63,660.65	\$1,182,783.14
Total Marketing Expenses	\$7,279.47	\$241,552.42	\$201,979.64	\$107,325.83	\$558,137.36
Total Interest Expense	\$40.20	\$32,832.73	\$58,533.86	\$66,021.39	\$157,428.18
Total Expenses	<b>\$21,723.02</b>	<b>\$1,290,260.01</b>	<b>\$349,357.78</b>	<b>\$237,007.87</b>	<b>\$1,898,348.68</b>
Original Budget	\$48,000.00	\$1,531,000.00	\$601,000.00	\$612,000.00	\$2,792,000.00
Variance to Budget	<b>-54.74%</b>	<b>-15.72%</b>	<b>-41.87%</b>	<b>-61.27%</b>	<b>-32.01%</b>

### Generation Status

	Jan 2017-Dec 2018 kWh	Cost
Generation Purchased	98,658,856	\$5,206,267.59
Generation Sold	91,122,366	\$4,808,563.98
Unsold Generation	7,536,490	\$397,703.61

### Solar Credits Donated

	Jan-Dec 2018 kWh	Donated
Generation Purchased/Unused Credits	1,730,390	\$27,780.24

[Click to see Solar Credits Donated Worksheet](#)

### 2018 NEWSLETTER - PROGRAM IN REVIEW

2018 Subscriber Solar Newsletter is in development and will be sent during April 2019.

### 2018 CUSTOMER SURVEY

A survey was sent to all participants to gauge customer satisfaction and support of the program. Customer satisfaction ratings are high and more than 90% of the participants support expansion of the program and 71% are supportive of adding a 100% solar option. More than 700 survey responses were received.

### 2018 SUBSCRIPTIONS AND MARKETING

The program remained sold out throughout 2018 with only 123 of 240,000 unbilled blocks for the year, primarily due to cancellations and gaps between billing cycles of new customer subscriptions. Marketing costs were low and mainly focused on expanding awareness through co-marketing partnership opportunities with other programs was viable.

### SOLAR PLANT PRODUCTION

The solar plant generated 2,511,859 more kilowatt hours during 2018 than required by the power purchase agreement. Through 2019, the program will endeavor to apply performance forecast and subscribe all available production.

# 2017 Subscriber Solar Dashboard

BLOCKS INVOICED						REVENUES			ENERGY GENERATED		
	RESIDENTIAL		COMMERCIAL			TOTAL BLOCKS		TOTAL \$	ON PEAK	OFF PEAK	TOTAL KWH
	1	3	23	6	6A	RESIDENTIAL	COMMERCIAL				
Jan-17	0	0	0	0	6	0	0	Jan-17			1,111,337
Feb-17	6,368	70	647	661	9,354	6,438	10662	Feb-17	\$84,015.90	\$132,741.90	249,210
Mar-17	6,663	82	829	987	10,889	6,745	12705	Mar-17	\$88,022.25	\$158,177.25	462,882
Apr-17	6,739	77	857	987	11,424	6,816	13268	Apr-17	\$88,948.80	\$165,186.60	801,746
May-17	6,756	84	948	989	9,870	6,840	11807	May-17	\$89,260.70	\$146,995.91	1,032,450
Jun-17	6,779	77	1,001	989	11,734	6,855	13724	Jun-17	\$89,463.75	\$170,862.93	911,279
Jul-17	6,787	77	793	989	12,073	6,864	13855	Jul-17	\$89,575.40	\$172,495.56	1,181,571
Aug-17	6,795	71	977	989	11,134	6,866	13100	Aug-17	\$89,606.06	\$163,095.00	656,321
Sep-17	6,849	68	771	989	10,638	6,917	12398	Sep-17	\$90,267.18	\$154,350.49	768,801
Oct-17	6,822	61	966	989	11,797	6,883	13752	Oct-17	\$89,821.98	\$171,213.21	647,574
Nov-17	6,827	61	742	995	11,372	6,888	13109	Nov-17	\$89,891.01	\$163,207.05	420,725
Dec-17	6,769	62	878	989	11,892	6,831	13759	Dec-17	\$89,140.83	\$171,299.55	357,667
<b>TOTAL Blocks</b>	<b>74,154</b>	<b>790</b>	<b>9,409</b>	<b>10,553</b>	<b>122,183</b>	<b>74,944</b>	<b>142,145</b>	<b>TOTAL \$</b>	<b>\$978,013.85</b>	<b>\$1,769,700.15</b>	<b>\$2,747,714.00</b>
<b>TOTAL KWH</b>	<b>14,830,786</b>	<b>157,932</b>	<b>1,881,718</b>	<b>2,110,600</b>	<b>24,436,600</b>	<b>14,988,718</b>	<b>28,428,918</b>	<b>TOTAL KWH</b>	<b>40,292,478</b>	<b>7,854,519</b>	<b>48,146,997</b>
						Res and Comm KWH	<b>43,417,636</b>				

## 2015-2017 EXPENSE DETAIL

2015	PROGRAM ADMIN & BILLING SETUP				MARKETING				TOTAL EXP	Original Budget	Variance
	Program Mgmt	Call Center	I/T Billing	TOTAL ADMIN	Cust Outreach	Prod/Collateral	Website	TOTAL MKTG			
	\$14,403.35			\$14,403.35				\$7,279.47	\$21,682.82	\$48,000.00	\$26,317.18
Jan-16	\$17,946.30	\$321.48	\$2,885.52	\$21,153.30				\$0.00	\$21,153.30	\$127,500.00	\$106,346.70
Feb-16	\$16,669.25	\$1,038.32	\$148,869.58	\$166,577.15				\$0.00	\$166,577.15	\$127,500.00	-\$39,077.15
Mar-16	\$13,554.93	\$2,072.52	\$122,968.33	\$138,595.78	\$4,047.84			\$4,047.84	\$142,643.62	\$127,500.00	-\$15,143.62
Apr-16	\$19,674.10	\$4,755.18	\$96,301.89	\$120,731.17	\$395.66			\$395.66	\$121,126.83	\$127,500.00	\$6,373.17
May-16	\$19,685.47	\$13,915.59	\$119,732.24	\$153,333.30	\$9,918.44			\$9,918.44	\$163,251.74	\$127,500.00	-\$35,751.74
Jun-16	\$18,128.00	\$3,715.21	\$81,912.57	\$103,755.78	\$9,194.21		\$19,319.75	\$28,513.96	\$132,269.74	\$127,500.00	-\$4,769.74
Jul-16	\$12,724.71		\$86,072.75	\$98,797.46	\$25,454.80			\$25,454.80	\$124,252.26	\$127,500.00	\$3,247.74
Aug-16	\$2,060.00		\$75,972.64	\$78,032.64	\$9,416.86		\$119,079.75	\$128,496.61	\$206,529.25	\$127,500.00	-\$79,029.25
Sep-16	\$4,120.00		\$44,287.64	\$48,407.64	\$3,066.95			\$3,066.95	\$51,474.59	\$127,500.00	\$76,025.41
Oct-16	\$5,541.39		\$42,445.24	\$47,986.63	\$6,044.81			\$6,044.81	\$54,031.44	\$127,500.00	\$73,468.56
Nov-16	\$6,222.93		\$21,774.97	\$27,997.90	\$24,250.15			\$24,250.15	\$52,248.05	\$127,500.00	\$75,251.95
Dec-16	\$4,532.00	\$225.32	\$5,748.79	\$10,506.11	\$11,363.20			\$11,363.20	\$21,869.31	\$128,500.00	\$106,630.69
<b>2016</b>	<b>\$140,859.08</b>	<b>\$26,043.62</b>	<b>\$848,972.16</b>	<b>\$1,015,874.86</b>	<b>\$103,152.92</b>	<b>\$0.00</b>	<b>\$138,399.50</b>	<b>\$241,552.42</b>	<b>\$1,257,427.28</b>	<b>\$1,531,000.00</b>	<b>\$273,572.72</b>
Jan-17	\$4,784.00	\$5,809.16	\$1,998.01	\$12,591.17	\$2,186.53			\$2,186.53	\$14,777.70	\$50,000.00	\$35,222.30
Feb-17	\$5,200.00	\$1,511.10	\$521.39	\$7,232.49	\$1,451.00			\$1,451.00	\$8,683.49	\$50,000.00	\$41,316.51
Mar-17	\$6,757.01	\$481.32	\$1,519.05	\$8,757.38	\$8,024.69			\$8,024.69	\$16,782.07	\$50,000.00	\$33,217.93
Apr-17	\$3,386.00		\$444.60	\$3,830.60	\$1,888.93			\$1,888.93	\$5,719.53	\$50,000.00	\$44,280.47
May-17	\$3,731.00		\$37.05	\$3,768.05	\$833.33	\$16.51	\$20,200.00	\$21,049.84	\$24,817.89	\$50,000.00	\$25,182.11
Jun-17	\$6,216.56	\$6,777.99		\$12,994.55				\$0.00	\$12,994.55	\$50,000.00	\$37,005.45
Jul-17	\$6,788.00	-\$1,072.10		\$5,715.90			\$50,383.00	\$50,383.00	\$56,098.90	\$50,000.00	-\$6,098.90
Aug-17	\$5,819.50			\$5,819.50	\$1,051.73		\$12,952.00	\$14,003.73	\$19,823.23	\$50,000.00	\$30,176.77
Sep-17	\$5,946.56			\$5,946.56	\$5,862.80	\$1,115.23	\$12,989.00	\$19,967.03	\$25,913.59	\$50,000.00	\$24,086.41
Oct-17	\$9,051.77			\$9,051.77			\$10,040.00	\$10,040.00	\$19,091.77	\$50,000.00	\$30,908.23
Nov-17	\$8,882.70			\$8,882.70	\$464.19		\$12,140.25	\$12,604.44	\$21,487.14	\$50,000.00	\$29,512.86
Dec-17	\$4,180.00	\$73.61		\$4,253.61	\$26,060.06	\$26,520.39	\$7,800.00	\$60,380.45	\$64,634.06	\$51,000.00	\$536,365.94
<b>2017</b>	<b>\$70,743.10</b>	<b>\$13,581.08</b>	<b>\$4,520.10</b>	<b>\$88,844.28</b>	<b>\$47,823.26</b>	<b>\$27,652.13</b>	<b>\$126,504.25</b>	<b>\$201,979.64</b>	<b>\$290,823.92</b>	<b>\$601,000.00</b>	<b>\$310,176.08</b>
<b>TOTAL EXPENSE</b>	<b>\$226,005.53</b>	<b>\$39,624.70</b>	<b>\$853,492.26</b>	<b>\$1,119,122.49</b>	<b>\$150,976.18</b>	<b>\$34,931.60</b>	<b>\$264,903.75</b>	<b>\$450,811.53</b>	<b>\$1,569,934.02</b>	<b>\$2,180,000.00</b>	<b>\$610,065.98</b>

INTEREST EXPENSE	
2015	\$40.20
2016	\$32,832.73
2017	\$58,533.86
Cancellation Fees	
2017	\$16,050.00

COST OF GENERATION	
	<b>2017</b>
Jan-17	\$71,641.88
Feb-17	\$103,217.23
Mar-17	\$184,422.95
Apr-17	\$240,114.48
May-17	\$307,594.84
Jun-17	\$343,369.85
Jul-17	\$294,802.82
Aug-17	\$276,616.23
Sep-17	\$224,961.41
Oct-17	\$227,837.53
Nov-17	\$136,140.04
Dec-17	\$129,102.17
<b>TOTAL</b>	<b>\$2,539,821.44</b>

# 2018 Subscriber Solar Dashboard

BLOCKS INVOICED						REVENUES			ENERGY GENERATED					
	RESIDENTIAL		COMMERCIAL			TOTAL BLOCKS		RESIDENTIAL	COMMERCIAL	TOTAL \$		ON PEAK	OFF PEAK	TOTAL KWH
	1	3	23	6	6A	RESIDENTIAL	COMMERCIAL							
Jan-18	6,771	69	852	982	10,009	6,840	11,843	\$89,263.63	\$147,445.35	\$236,708.98	2,099,062	435,843	2,534,905	
Feb-18	6,761	70	722	968	11,181	6,831	12,871	\$89,146.05	\$160,243.08	\$249,389.13	2,583,035	457,613	3,040,648	
Mar-18	7,005	70	708	249	10,853	7,075	11,810	\$92,334.95	\$147,034.50	\$239,369.45	3,751,634	394,482	4,146,116	
Apr-18	6,810	70	1,099	1,806	12,043	6,880	14,948	\$89,785.24	\$186,107.58	\$275,892.82	3,790,460	854,798	4,645,258	
May-18	6,617	70	676	981	10,619	6,687	12,276	\$87,260.52	\$152,841.99	\$240,102.51	4,664,218	815,070	5,479,288	
Jun-18	6,851	66	932	1,151	10,999	6,918	13,082	\$90,274.48	\$162,872.89	\$253,147.38	5,853,106	926,663	6,779,769	
Jul-18	6,835	64	839	1,151	12,245	6,899	14,235	\$90,034.49	\$177,223.94	\$267,258.44	4,379,884	1,235,167	5,615,051	
Aug-18	6,800	63	898	1,151	10,100	6,863	12,149	\$89,567.50	\$151,255.05	\$240,822.55	4,470,187	735,177	5,205,364	
Sep-18	6,997	66	916	1,233	10,496	7,063	12,646	\$92,171.30	\$157,436.85	\$249,608.15	4,243,722	1,026,513	5,270,235	
Oct-18	6,821	68	893	981	11,591	6,889	13,465	\$89,896.95	\$167,639.25	\$257,536.20	3,035,636	369,026	3,404,662	
Nov-18	6,856	56	829	981	11,412	6,912	13,222	\$90,198.27	\$164,620.00	\$254,818.27	2,405,862	365,483	2,771,345	
Dec-18	6,812	49	841	1,097	11,320	6,861	13,258	\$89,532.46	\$165,063.72	\$254,596.18	1,347,405	271,813	1,619,218	
<b>TOTAL Blocks</b>	<b>81,937</b>	<b>781</b>	<b>10,207</b>	<b>12,731</b>	<b>132,868</b>	<b>82,718</b>	<b>155,806</b>							
<b>TOTAL KWH</b>	<b>16,387,379</b>	<b>156,159</b>	<b>2,041,313</b>	<b>2,546,240</b>	<b>26,573,639</b>	<b>16,543,538</b>	<b>31,161,192</b>	<b>\$1,079,465.85</b>	<b>\$1,939,784.20</b>	<b>\$3,019,250.06</b>	<b>42,624,211</b>	<b>7,887,648</b>	<b>50,511,859</b>	
						Res and Comm KWH	<b>47,704,730</b>							

## 2015-2018 EXPENSE DETAIL

	PROGRAM ADMIN & BILLING SETUP			TOTAL ADMIN	MARKETING			TOTAL EXP	Original Budget	Variance	
	Program Mgmt	Call Center	I/T Billing		Cust Outreach	Prod/Collateral	Website				TOTAL MKTG
<b>2015</b>	<b>\$14,403.35</b>			<b>\$14,403.35</b>			<b>\$7,279.47</b>	<b>\$21,682.82</b>	<b>\$48,000.00</b>	<b>\$26,317.18</b>	
Jan-16	\$17,946.30	\$321.48	\$2,885.52	\$21,153.30			\$0.00	\$21,153.30	\$127,500.00	\$106,346.70	
Feb-16	\$16,669.25	\$1,038.32	\$148,869.58	\$166,577.15			\$0.00	\$166,577.15	\$127,500.00	-\$39,077.15	
Mar-16	\$13,554.93	\$2,072.52	\$122,968.33	\$138,595.78	\$4,047.84		\$4,047.84	\$142,643.62	\$127,500.00	-\$15,143.62	
Apr-16	\$19,674.10	\$4,755.18	\$96,301.89	\$120,731.17	\$395.66		\$395.66	\$121,126.83	\$127,500.00	-\$6,373.17	
May-16	\$19,685.47	\$13,915.59	\$119,732.24	\$153,333.30	\$9,918.44		\$9,918.44	\$163,251.74	\$127,500.00	-\$35,751.74	
Jun-16	\$18,128.00	\$3,715.21	\$81,912.57	\$103,755.78	\$9,194.21	\$19,319.75	\$28,513.96	\$132,269.74	\$127,500.00	-\$4,769.74	
Jul-16	\$12,724.71		\$86,072.75	\$98,797.46	\$25,454.80		\$25,454.80	\$124,252.26	\$127,500.00	-\$3,247.74	
Aug-16	\$2,060.00		\$75,972.64	\$78,032.64	\$9,416.86	\$119,079.75	\$128,496.61	\$206,529.25	\$127,500.00	-\$79,029.25	
Sep-16	\$4,120.00		\$44,287.64	\$48,407.64	\$3,066.95		\$3,066.95	\$51,474.59	\$127,500.00	\$76,025.41	
Oct-16	\$5,541.39		\$42,445.24	\$47,986.63	\$6,044.81		\$6,044.81	\$54,031.44	\$127,500.00	\$73,468.56	
Nov-16	\$6,222.93		\$21,774.97	\$27,997.90	\$24,250.15		\$24,250.15	\$52,248.05	\$127,500.00	\$75,251.95	
Dec-16	\$4,532.00	\$225.32	\$5,748.79	\$10,506.11	\$11,363.20		\$11,363.20	\$21,869.31	\$128,500.00	\$106,630.69	
<b>2016</b>	<b>\$140,859.08</b>	<b>\$26,043.62</b>	<b>\$848,972.16</b>	<b>\$1,015,874.86</b>	<b>\$103,152.92</b>	<b>\$0.00</b>	<b>\$138,399.50</b>	<b>\$241,552.42</b>	<b>\$1,257,427.28</b>	<b>\$1,531,000.00</b>	<b>\$273,572.72</b>
Jan-17	\$4,784.00	\$5,809.16	\$1,998.01	\$12,591.17	\$2,186.53		\$2,186.53	\$14,777.70	\$50,000.00	\$35,222.30	
Feb-17	\$5,200.00	\$1,511.10	\$521.39	\$7,232.49	\$1,451.00		\$1,451.00	\$8,683.49	\$50,000.00	\$41,316.51	
Mar-17	\$6,757.01	\$481.32	\$1,519.05	\$8,757.38	\$8,024.69		\$8,024.69	\$16,782.07	\$50,000.00	\$33,217.93	
Apr-17	\$3,386.00		\$444.60	\$3,830.60	\$1,888.93		\$1,888.93	\$5,719.53	\$50,000.00	\$44,280.47	
May-17	\$3,731.00		\$37.05	\$3,768.05	\$833.33	\$16.51	\$20,200.00	\$21,049.84	\$50,000.00	\$25,182.11	
Jun-17	\$6,216.56	\$6,777.99		\$12,994.55			\$0.00	\$12,994.55	\$50,000.00	\$37,005.45	
Jul-17	\$6,788.00	-\$1,072.10		\$5,715.90			\$50,383.00	\$56,098.90	\$50,000.00	-\$6,098.90	
Aug-17	\$5,819.50			\$5,819.50	\$1,051.73		\$12,952.00	\$14,003.73	\$50,000.00	\$30,176.77	
Sep-17	\$5,946.56			\$5,946.56	\$5,862.80	\$1,115.23	\$12,989.00	\$19,967.03	\$50,000.00	\$24,086.41	
Oct-17	\$9,051.77			\$9,051.77	\$10,040.00		\$10,040.00	\$19,091.77	\$50,000.00	\$30,908.23	
Nov-17	\$8,882.70			\$8,882.70	\$464.19		\$12,140.25	\$12,604.44	\$50,000.00	\$28,512.86	
Dec-17	\$4,180.00	\$73.61		\$4,253.61	\$26,060.06	\$26,520.39	\$7,800.00	\$60,380.45	\$51,000.00	-\$13,634.06	
<b>2017</b>	<b>\$70,743.10</b>	<b>\$13,581.08</b>	<b>\$4,520.10</b>	<b>\$88,844.28</b>	<b>\$47,823.26</b>	<b>\$27,652.13</b>	<b>\$126,504.25</b>	<b>\$201,979.64</b>	<b>\$601,000.00</b>	<b>\$310,176.08</b>	
Jan-18	\$5,606.50			\$5,606.50	\$75.00		\$10,276.75	\$10,276.75	\$51,000.00	\$35,116.75	
Feb-18	\$5,211.00			\$5,211.00			\$75.00	\$5,286.00	\$51,000.00	\$45,714.00	
Mar-18	\$4,399.50			\$4,399.50	\$1,195.62	\$63.30	\$12,492.25	\$12,555.55	\$51,000.00	\$34,044.95	
Apr-18	\$5,935.00	\$0.00		\$5,935.00	\$1,325.09	\$9,204.25	\$5,114.00	\$15,513.87	\$51,000.00	\$29,551.13	
May-18	\$2,860.00			\$2,860.00	\$15.83		\$7,092.25	\$8,433.17	\$51,000.00	\$39,706.83	
Jun-18	\$6,240.74	\$0.00		\$6,240.74	\$200.00	\$1,190.45	\$2,928.00	\$4,318.45	\$51,000.00	\$40,440.81	
Jul-18	\$5,600.00	\$0.00		\$5,600.00	\$1,701.65	\$170.00	\$10,164.25	\$12,035.90	\$51,000.00	\$33,364.10	
Aug-18	\$7,889.13	\$8,604.20		\$16,493.33	\$272.80	\$0.00	\$1,040.00	\$1,312.80	\$51,000.00	\$33,193.87	
Sep-18	\$2,418.00	\$204.06		\$2,622.06	\$0.00	\$0.00	\$8,649.75	\$8,649.75	\$51,000.00	\$39,728.19	
Oct-18	\$2,687.74	\$0.00		\$2,687.74	\$799.70	\$0.00	\$17,086.50	\$17,886.20	\$51,000.00	\$30,426.06	
Nov-18	\$5,867.28	\$0.00		\$5,867.28	\$0.00	\$0.00	\$0.00	\$5,867.28	\$51,000.00	\$45,132.72	
Dec-18	\$137.50	\$0.00		\$137.50	\$7,708.57	\$0.00	\$8,559.82	\$16,268.39	\$51,000.00	\$34,594.11	
<b>2018</b>	<b>\$54,852.39</b>	<b>\$8,808.26</b>	<b>\$0.00</b>	<b>\$63,660.65</b>	<b>\$13,278.43</b>	<b>\$10,643.83</b>	<b>\$83,403.57</b>	<b>\$107,325.83</b>	<b>\$612,000.00</b>	<b>\$441,013.52</b>	
<b>TOTAL EXPENSE</b>	<b>\$280,857.92</b>	<b>\$48,432.96</b>	<b>\$853,492.26</b>	<b>\$1,182,783.14</b>	<b>\$164,254.61</b>	<b>\$45,575.43</b>	<b>\$348,307.32</b>	<b>\$558,137.36</b>	<b>\$1,740,920.50</b>	<b>\$2,792,000.00</b>	<b>\$1,051,079.50</b>
								Less Interest, plus cancellation fees			<b>\$927,251.32</b>

## INTEREST EXPENSE

2015	\$40.20
2016	\$32,832.73
2017	\$58,533.86
2018	\$66,021.39
<b>Cancellation Fees</b>	
2017	\$16,050.00
2018	\$17,550.00

## COST OF GENERATION

	2017	2018	TOTAL
Jan	\$71,641.88	\$133,647.98	\$205,289.87
Feb	\$103,217.23	\$160,511.21	\$263,728.44
Mar	\$184,422.95	\$218,879.92	\$403,302.87
Apr	\$240,114.48	\$245,234.62	\$485,349.11
May	\$307,594.84	\$289,271.41	\$596,866.24
Jun	\$343,369.85	\$357,936.80	\$701,306.65
Jul	\$294,802.82	\$296,439.69	\$591,242.52
Aug	\$276,616.23	\$274,808.22	\$551,424.45
Sep	\$224,961.41	\$278,233.41	\$503,194.82
Oct	\$227,837.53	\$179,731.15	\$407,568.69
Nov	\$136,140.04	\$146,292.02	\$282,432.05
Dec	\$129,102.17	\$85,459.71	\$214,561.88
<b>TOTAL</b>	<b>\$2,539,821.44</b>	<b>\$2,666,446.15</b>	<b>\$5,206,267.59</b>

# Subscriber Solar Credit - Excess Energy Valuation

[Return to Summary](#)

Onpeak	Hrs
Hrs Per Day (6am to 10pm)	16
Days Per Week	6
<b>Total</b>	<b>96</b>
Offpeak (10pm to 6am)	8
Days	6
<b>Total</b>	<b>48</b>
Sunday	24
<b>Total</b>	<b>72</b>
Total Hours	168
Reconcile 7 * 24	168

Uses volumetric winter and summer energy prices for on-peak and off-peak hours for non-levelized tracking solar facilities

2018 Winter (Oct-May) - Prices effective Jan 2019 (time of valuation/single donation)	Percent	Sch. 37	Calc	Allocation (8 mo)	cents per kWh
Onpeak Rate	0.57	1.686	0.96	0.66666667	0.64
Offpeak Rate	0.43	1.590	0.68	0.66666667	0.46

2018 Summer (Jun-Sep) - Prices effective Jan 2019 (time of valuation/single donation)	Percent	Sch. 37	Calc	Allocation (4 mo)	cents per kWh
Onpeak Rate	0.57	1.826	1.04	0.33333333	0.35
Offpeak Rate	0.43	1.128	0.48	0.33333333	0.16

**Total Donated kWh value, 2018** 1,730,390

**Total Avoided Cost (per kWh)** \$0.0161

**Annualized Billing Period (12 months)** \$ 27,780.24

Customer Class	Donation
Commercial	783,657
Industrial	669,894
Residential	276,839
<b>Grand Total</b>	<b>1,730,390</b>

Confidential Exhibit B  
Updated Cost Model



**THIS EXHIBIT IS CONFIDENTIAL IN ITS  
ENTIRETY AND IS PROVIDED UNDER  
SEPARATE COVER**

**CERTIFICATE OF SERVICE**

Docket No. 19-035-15

I hereby certify that on May 14, 2019, a true and correct copy of the foregoing was served by electronic mail to the following:

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Katie Savarin  
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