

Docket No. 19-035-T08

Attachments to Office of Consumer Services Comments

May 21, 2019

19-035-T08 / Rocky Mountain Power

May 15, 2019

OCS Data Request 2.1

OCS Data Request 2.1

Please provide the monthly cost per schedule to maintain the billing accommodation needed for rate schedules 2, 8, 9 and 9A.

Response to OCS Data Request 2.1

The billing for each of these schedules would be performed manually. A conservative estimate for calculating and generating the bill would be approximately 0.5 hours for each account subscribed, per month, for the entire time that a customer would be enrolled. Annually, this would equate to approximately \$600 per account, based on loaded full-time equivalent (FTE) costs related to analysts that generate manual statements.

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OCS Data Request 4.1

OCS Data Request 4.1

In justifying the Company's request to remove Schedules 2, 8, 9 and 9a, the Company states, "Maintaining the billing accommodation needed for these rate schedules is a needless financial burden on the Program". Since no customers from these classes are currently subscribing to the Program, please explain what "financial burden" is placed on the Program by keeping open the option for participation by customers of these schedules. Please do not refer to the Company's response to OCS DR # 2.1 as that answer is not responsive to the question.

Response to OCS Data Request 4.1

Correct, there are no current financial burdens on the program for serving customers under Rate Schedules 2, 8, 9 and 9a, since these customers have not expressed interest in participating. Removing these schedules from the scope of the tariff would enable the program to avoid any potential future costs of manual billing that would be required for these customers.

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OCS Data Request 3.3

OCS Data Request 3.3

Please refer to Second Revision of Sheet No. 73.1 included in the Company's filing. Under the Full Coverage Option customers can purchase variable blocks of capacity (and associated energy)...How many kWhs are included in a "variable block"? Under this option are customers purchasing individual kWh amounts equal to their total usage and the current 200 kWh block would no-longer apply to them? Please clarify what "variable block" means.

Response to OCS Data Request 3.3

Correct, 'variable block' refers to their total monthly usage being subscribed through the existing, applicable Subscriber Solar rate. The 200 kilowatt-hour (kWh) block limitation would not apply to customers that are subscribed to the Full Coverage Option.

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OCS Data Request 3.2

OCS Data Request 3.2

If the Commission approves the Company's request to add a Full Coverage Option to the tariff how will the Company determine which customers will be eligible for that option? Will customers on the waitlist be given the opportunity to subscribe before allowing existing customers to change their subscription to the Full Coverage Option?

Response to OCS Data Request 3.2

All customer requests are handled in the order they are received. If a customer wishes to switch from block subscription to the full coverage option, they will be added to the waitlist and their request will be honored in the order received.

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OCS Data Request 2.2

OCS Data Request 2.2

Under the Company's proposal to include a "full coverage option" it seems that it could be possible for customer usage to exceed solar production. How will the Company handle that situation?

Response to OCS Data Request 2.2

The assigned program manager monitors the plant generation and subscription rates through a monthly performance dashboard report to ensure the program is not over-subscribed. The proposed change only includes residential and small commercial rate schedules since usage under these schedules is predictable.

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OCS Data Request 2.3

OCS Data Request 2.3

Why is the Company not offering the full coverage option to Schedules 6, 6A or 6B?

Response to OCS Data Request 2.3

The program is only offering the 100 percent option to residential and small commercial rate schedules since usage under these schedules is much more predictable and there is very low risk of over-subscribing the program.

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OCS Data Request 3.1

OCS Data Request 3.1

Confidential Exhibit B Columns K and L Row 59 show a substantial projected increase over prior years. Please explain the reason(s) for the increase.

Response to OCS Data Request 3.1

The cost is not an actual increase in total funds, it is simply a reallocation of the funds that were not spent in the first three years of the program and would allow for the dollars to be spent in Year 4 and Year 5. Additional marketing efforts are anticipated to communicate the 100 percent option (full coverage) being proposed in this docket, and to plan for any marketing activities that might be needed to address turnover of subscriptions once the three-year commitment mark is achieved by current subscribers with the goal of subscribing the program as close to 100 percent levels as possible.

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DPU Data Request 2.4

DPU Data Request 2.4

CONFIDENTIAL REQUEST - The original design forecast showed that the program would reach its break-even point and support itself at the end of [REDACTED]. The proposal shows the break-even pushed out to the end of [REDACTED]. How is this in the public interest? What are the impacts to the EBA?

Response to DPIU Data Request 2.4

The program's break-even point is across the entire 20-year amortization schedule shown in the program cost model, as demonstrated by the zero net present value (NPV) when evaluating all future cash flows. The only change proposed to the program cost model is reallocation of the unspent funds that were originally projected for the first three years of the program into Year 4 and Year 5. No additional expenses or funds are being added to the program's overall business model. The energy balancing account (EBA) is only impacted for any unsold generation each year, as discussed in Docket No. 15-035-61.

Confidential information is provided subject to Public Service Commission of Utah Rule 746-1-602 and 746-1-603.